

# **AUCKLAND UNITARY PLAN OPERATIVE IN PART**

## **PROPOSED PLAN CHANGE 119 (Private): Ara Hills (Hall Farm)**

### **SUMMARY OF DECISIONS REQUESTED**

**Enclosed:**

- **Explanation**
- **Summary of Decisions Requested**
- **Submissions**

## Explanation

- You may make a “further submission” to support or oppose any submission already received (see summaries that follow).
- You should use Form 6.
- Your further submission must be received by **28 November 2025, 5PM.**
- Send a copy of your further submission to the original submitter as soon as possible after submitting it to the Council.

## **Summary of Decisions Requested**

**Plan Change 119 (Private): Ara Hills (Hall Farm)**

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| Sub # | Sub Point | Submitter Name                       | Address for Service                                                                                                        | Summary of Decisions Requested                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------|-----------|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1     | 1.1       | Craig Jefferies and Lalita Jefferies | <a href="mailto:dr_bear_toronto@yahoo.ca">dr_bear_toronto@yahoo.ca</a>                                                     | Finer grain application of residential zoning rather than the proposed MHU zoning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1     | 1.2       | Craig Jefferies and Lalita Jefferies | <a href="mailto:dr_bear_toronto@yahoo.ca">dr_bear_toronto@yahoo.ca</a>                                                     | Amend IXXX.6.(3)(b) to include H6.6.5 (Residential - Terrace Housing and Apartment Building Zone Building Height Standard                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 1     | 1.3       | Craig Jefferies and Lalita Jefferies | <a href="mailto:dr_bear_toronto@yahoo.ca">dr_bear_toronto@yahoo.ca</a>                                                     | Amend IXXX6.2.4 to strengthen clarity and avoid perverse outcomes such as multi storied drive-through convenience retail. Suggest addition of rules around frontage and pedestrian amenity.                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1     | 1.4       | Craig Jefferies and Lalita Jefferies | <a href="mailto:dr_bear_toronto@yahoo.ca">dr_bear_toronto@yahoo.ca</a>                                                     | Clarify relationship between the additional controls in the Ara Hills Home Design Guidelines and the MDRS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 1     | 1.5       | Craig Jefferies and Lalita Jefferies | <a href="mailto:dr_bear_toronto@yahoo.ca">dr_bear_toronto@yahoo.ca</a>                                                     | Clarification is required around the following aspect of the new precinct:<br>- requiring all open space to be accessible to the public even though most of it will be owned and managed by the residents;                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2     | 2.1       | Rodney Harman                        | <a href="mailto:rodsgarage@xtra.co.nz">rodsgarage@xtra.co.nz</a>                                                           | The applicant consult with landowners for the purpose of recording agreements as to the location of future infrastructure connections for roading, wastewater, water supply, stormwater and overland flow paths in a manner that is binding on the landowner, and which gives certainty of access to future neighbouring landowners.                                                                                                                                                                                                                                                                                 |
| 2     | 2.2       | Rodney Harman                        | <a href="mailto:rodsgarage@xtra.co.nz">rodsgarage@xtra.co.nz</a>                                                           | In the absence of a structure plan for the Future Urban Zoned area, rules or conditions must be imposed to prevent future owners of the application land from frustrating development of adjoining areas.                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2     | 2.3       | Rodney Harman                        | <a href="mailto:rodsgarage@xtra.co.nz">rodsgarage@xtra.co.nz</a>                                                           | The applicant must form the road to the western boundary of 55 Russell Road as required under the existing resource consents and as shown in the general arrangement for the NOR 6 designation.                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3     | 3.1       | Director-General of Conservation     | <a href="mailto:cschipper@doc.govt.nz">cschipper@doc.govt.nz</a> ;<br><a href="mailto:RMA@doc.govt.nz">RMA@doc.govt.nz</a> | Retain PPC as notified, except as sought below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3     | 3.2       | Director-General of Conservation     | <a href="mailto:cschipper@doc.govt.nz">cschipper@doc.govt.nz</a> ;<br><a href="mailto:RMA@doc.govt.nz">RMA@doc.govt.nz</a> | Retain Objectives (3), (4), (8) and (13) as notified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3     | 3.3       | Director-General of Conservation     | <a href="mailto:cschipper@doc.govt.nz">cschipper@doc.govt.nz</a> ;<br><a href="mailto:RMA@doc.govt.nz">RMA@doc.govt.nz</a> | Retain Policies (5), (6), (7), (11), (12) and (13) as notified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3     | 3.4       | Director-General of Conservation     | <a href="mailto:cschipper@doc.govt.nz">cschipper@doc.govt.nz</a> ;<br><a href="mailto:RMA@doc.govt.nz">RMA@doc.govt.nz</a> | Retain Table IXXX.4.1 All zone activity, Use (A1) as notified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 3     | 3.5       | Director-General of Conservation     | <a href="mailto:cschipper@doc.govt.nz">cschipper@doc.govt.nz</a> ;<br><a href="mailto:RMA@doc.govt.nz">RMA@doc.govt.nz</a> | Retain Table IXXX.4.2 Mixed Housing Urban – Nukumea Scenic Reserve Protection Sub-precinct as notified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 3     | 3.6       | Director-General of Conservation     | <a href="mailto:cschipper@doc.govt.nz">cschipper@doc.govt.nz</a> ;<br><a href="mailto:RMA@doc.govt.nz">RMA@doc.govt.nz</a> | Retain IXXX.6.2.3 as notified but amend minor formatting issue where bullet 3 is included at the end of bullet 2, and re-number the additional provisions as necessary:<br><br><i>(2) All buildings on a site that are not within the Nukumea Reserve Sub-precinct ... The 10m buffer area must be planted in native eco- sourced vegetation. __ (3) A minimum of 60 per cent of the net site area ...</i><br><br><i>(4) <del>(3)</del> Any minor dwellings on a site in the Nukumea Scenic Reserve Protection Subprecinct must:...</i><br><br><i>(5) <del>(4)</del> The maximum building coverage on a site ...</i> |
| 3     | 3.7       | Director-General of Conservation     | <a href="mailto:cschipper@doc.govt.nz">cschipper@doc.govt.nz</a> ;<br><a href="mailto:RMA@doc.govt.nz">RMA@doc.govt.nz</a> | Retain IXXX.6.3.3 Subdivision standards for sites within the Nukumea Reserve Protection Sub-precinct as notified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3     | 3.8       | Director-General of Conservation     | <a href="mailto:cschipper@doc.govt.nz">cschipper@doc.govt.nz</a> ;<br><a href="mailto:RMA@doc.govt.nz">RMA@doc.govt.nz</a> | Retain IXXX.6.3.4 Subdivision standards for riparian margins as notified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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| 3     | 3.9       | Director-General of Conservation | <a href="mailto:cschipper@doc.govt.nz">cschipper@doc.govt.nz</a> ;<br><a href="mailto:RMA@doc.govt.nz">RMA@doc.govt.nz</a> | Retain IXXX.6.3.5 Subdivision standards for ecological connections as notified.                                                                                                                                                                                                                                                   |
| 3     | 3.10      | Director-General of Conservation | <a href="mailto:cschipper@doc.govt.nz">cschipper@doc.govt.nz</a> ;<br><a href="mailto:RMA@doc.govt.nz">RMA@doc.govt.nz</a> | Retain IXXX.9.1- Native Revegetation Planting Plan as notified.                                                                                                                                                                                                                                                                   |
| 4     | 4.1       | Fire and Emergency New Zealand   | <a href="mailto:eva.mason@beca.com">eva.mason@beca.com</a>                                                                 | Amend Objective IXXX.2(2) as follows:<br><i>Subdivision and development is coordinated with the provision of bulk and local water supply, firefighting water supply, and wastewater infrastructure and the Stormwater Management Plan.</i>                                                                                        |
| 4     | 4.2       | Fire and Emergency New Zealand   | <a href="mailto:eva.mason@beca.com">eva.mason@beca.com</a>                                                                 | Add a new Objective IXXX.2(13)<br><i>All development and new buildings are to be in accordance with the Designers Guide to Firefighting Operations: Emergency Vehicle Access F5-02 GD.</i>                                                                                                                                        |
| 4     | 4.3       | Fire and Emergency New Zealand   | <a href="mailto:eva.mason@beca.com">eva.mason@beca.com</a>                                                                 | Amend Policy IXXX.3(17) as follows:<br><i>Avoid subdivision and development in advance of the provision of functioning bulk water supply, firefighting water supply, and bulk wastewater infrastructure with sufficient capacity to service subdivision and development within the Precinct.</i>                                  |
| 4     | 4.4       | Fire and Emergency New Zealand   | <a href="mailto:eva.mason@beca.com">eva.mason@beca.com</a>                                                                 | Add a new policy IXXX.3(24) as follows:<br><i>Avoid subdivision and development of new buildings that are not in accordance with the Designers Guide to Firefighting Operations: Emergency Vehicle Access F5-02 GD.</i>                                                                                                           |
| 4     | 4.5       | Fire and Emergency New Zealand   | <a href="mailto:eva.mason@beca.com">eva.mason@beca.com</a>                                                                 | Amend Table IXXX.4.1 All Zoned Development Rule (A5) as follows:<br><i>Development that does not comply with Standard IXXX.6.2.2 High Contaminant Yielding Materials and IXXX6.2.5 Stormwater, 1XXX.6.2.6 Bulk Water Supply, Firefighting Water Supply and Wastewater Infrastructure and IXXX6.2.7 Vehicle Access Restriction</i> |
| 4     | 4.6       | Fire and Emergency New Zealand   | <a href="mailto:eva.mason@beca.com">eva.mason@beca.com</a>                                                                 | Add to Table IXXX.4.1 Road and Access (A6) as follows:<br><i>All roads and vehicle access within Subdivisions to be in accordance with Designers Guide to Firefighting Operations: Emergency Vehicle Access F5-02 GD.</i>                                                                                                         |
| 4     | 4.7       | Fire and Emergency New Zealand   | <a href="mailto:eva.mason@beca.com">eva.mason@beca.com</a>                                                                 | Add to Table IXXX.4.1 Road and Access (A8) Subdivision as follows:<br><i>All roads and vehicle access within developments to be in accordance with Designers Guide to Firefighting Operations: Emergency Vehicle Access F5-02 GD.</i>                                                                                             |

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| 4     | 4.8       | Fire and Emergency New Zealand | <a href="mailto:eva.mason@beca.com">eva.mason@beca.com</a>                 | Amend IXXX 6.2.6 (1) Bulk Water Supply and Wastewater Infrastructure as follows:<br><i>(1) Bulk water supply, <u>firefighting water supply</u>, and wastewater infrastructure with sufficient capacity for servicing the proposed development or subdivision must be completed, commissioned and functioning prior to construction of any buildings or creation of any lots. <u>Firefighting water supply, and access to that supply, must comply with SNZ PAS 4509:2008.</u></i> |
| 4     | 4.9       | Fire and Emergency New Zealand | <a href="mailto:eva.mason@beca.com">eva.mason@beca.com</a>                 | Amend IXXX.6.2.8.10 Road and Access as follows:<br><u>IXXX.6.2.8.10 Road and Access</u><br><i>(X) All roads and vehicle access to be in accordance with <u>Designers Guide to Firefighting Operations: Emergency Vehicle Access F5-02 GD</u>.</i>                                                                                                                                                                                                                                 |
| 5     | 5.1       | Suju Wang                      | <a href="mailto:zzwnz@hotmail.com">zzwnz@hotmail.com</a>                   | Approve the plan change without any amendments.                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 6     | 6.1       | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Decline the plan change unless the matters set out in this submission, are addressed and resolved to AT's satisfaction.                                                                                                                                                                                                                                                                                                                                                           |
| 6     | 6.2       | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Applicant provide updated traffic data and modelling, and associated information [see submission for detail of information requested]                                                                                                                                                                                                                                                                                                                                             |
| 6     | 6.3       | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Applicant clarify what development has been constructed to date, and demonstrate that the roading layout is consistent with the Precinct Plan 1.                                                                                                                                                                                                                                                                                                                                  |
| 6     | 6.4       | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Applicant clarify:<br>- that local road connections along the western boundary, and southern boundary south of Grand Drive West, can be constructed and<br>- how it is intended to serve the land in the south west corner north of the Grand Drive West alignment and<br>- amend the plan change and precinct provisions as required.                                                                                                                                            |
| 6     | 6.5       | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Applicant assess the resilience of Grand Drive West in providing access into a 900 dwelling development with only one road in and out and amend the plan change and precinct provisions as required.                                                                                                                                                                                                                                                                              |
| 6     | 6.6       | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend the precinct provisions to limit development to 950 dwellings with additional assessments, including a transport assessment, required for proposals which would result in more than 950 dwellings or residential units within the precinct.                                                                                                                                                                                                                                 |
| 6     | 6.7       | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend the plan change to include precinct provisions (an objective, policy, standards, matters of discretion, and assessment criteria) to require that future developments and alterations to existing buildings mitigate potential road traffic noise effects on activities sensitive to noise from the proposed arterial being Grand Drive West (including AT NOR6).                                                                                                            |
| 6     | 6.8       | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Remove the proposed THAB zoning from the land south of Grand Drive West which is located between the stream and indicative open space areas and the western and southern boundaries of the plan change area. Apply a lower intensity zoning appropriate to accessibility of the land and consistent with Objective H6.2(1).                                                                                                                                                       |
| 6     | 6.9       | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend the plan change by including precinct provisions relating to road design. Include a Road Function and Design Elements table which sets out minimum requirements for roads, including role and function, width, speed limit, active modes. Provide for non-compliance with the road design standard and associated table as a restricted discretionary activity.                                                                                                             |
| 6     | 6.10      | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Objective 1 as follows:<br><i>(1) Subdivision and development are in accordance with Precinct Plan 1, and are staged, designed, and delivered to align with the provision and upgrading of open space and transport infrastructure ( <del>strategie</del> <u>future arterial road corridor</u>, <u>and other road connections and pedestrian and cycling linkages</u>).</i>                                                                                                 |
| 6     | 6.11      | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Retain Objective 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 6     | 6.12      | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Retain Objective 6                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 6     | 6.13      | Auckland Transport             | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Retain Objective 10                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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| 6     | 6.14      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Retain Policy 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 6     | 6.15      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Policy 4 as follows:<br><i>(4) The design and built form of the neighbourhood centre must take account of the future arterial road corridor and incorporate restricted vehicle access including by avoiding vehicle access from that road as shown on Precinct Plan 1.</i>                                                                                                                                                                                                                                                                         |
| 6     | 6.16      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Policy 8 as follows:<br><i>(8) Locate, construct and vest the indicative road s layout and other transport upgrades, including pedestrian linkages and cycleways and safeguard the future arterial road corridor, in general accordance with Precinct Plan 1 and the relevant staging provisions. Any required amendments to the existing road network, including pedestrian and cycleways must be designed and undertaken in consultation and with the agreement of Waka Kotahi – NZTA and Auckland Transport.</i>                                |
| 6     | 6.17      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Table IXXX.4.1 All zones (A2) and (A5)<br>Retain the non-complying activity status applying to use and development that does not comply with Standard IXXX6.2.7 Vehicle Access Restriction.                                                                                                                                                                                                                                                                                                                                                              |
| 6     | 6.18      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Table IXXX.4.1 All zones - reword (A8) as follows, and retain the discretionary activity status for not meeting the standard:<br><i>Subdivision that is not in accordance does not comply with Standard IXXX.6.2.8.6 ... and IXXX.6.2.3.8.40 Road ing and Access.</i>                                                                                                                                                                                                                                                                                    |
| 6     | 6.19      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Insert a new entry in Table IXXX.4.1 All zones applying discretionary activity status to the following:<br><i>Development that does not comply with Standard IXXX.6.3.8 Rooding and Access.</i>                                                                                                                                                                                                                                                                                                                                                          |
| 6     | 6.20      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Standard IXXX.6.2.7 Vehicle Access Restriction, as follows:<br><i>Purpose: To safeguard the future arterial status of Grand Drive, provide for the safe and efficient operation of the arterial road network and enhance ensure vehicle and pedestrian safety for active modes .</i><br><i>(1) Standard E27.6.4.1(3) applies to all the site boundaries along the frontage of Grand Drive. No vehicle crossings or vehicle access are allowed off is permitted from Grand Drive (shown as Indicative Future Arterial Road on Precinct Plan 1).</i> |
| 6     | 6.21      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Clarify why Standard IXXX.6.3.1(1) duplicates transport matters (provision of vehicle, pedestrian connections, and roading) covered in Standard IXXX.6.3.8 Subdivision standards for roading access.<br>Amend Standard IXXX.6.3.1(1) to remove any unnecessary duplication.                                                                                                                                                                                                                                                                              |
| 6     | 6.22      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Retain the following wording in Standard IXXX.6.3.4(1):<br><i>... This standard does not apply to road crossings over streams.</i>                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 6     | 6.23      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend IXXX.6.3.8 Subdivision standards for roading and access to apply to development as well as subdivision. This includes relocating the standard to the Precinct Standards under IXXX.6.2.                                                                                                                                                                                                                                                                                                                                                            |
| 6     | 6.24      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Standard IXXX.6.3.8 as follows:<br>IXXX.6.3.8-Subdivision sStandards for roading and access<br><i>Purpose – To ensure subdivision and development within the precinct is supported by a safe, efficient and legible movement and transport network.</i>                                                                                                                                                                                                                                                                                            |
| 6     | 6.25      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Standard IXXX.6.3.8 to include a requirement for safe crossing facilities to be provided over Grand Drive West between the two parts of the proposed Neighbourhood Centre.                                                                                                                                                                                                                                                                                                                                                                         |
| 6     | 6.26      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Standard IXXX.6.3.8(2) to clarify the reference to 'pedestrian accessways'. There are no pedestrian accessways shown on Precinct Plan 1.                                                                                                                                                                                                                                                                                                                                                                                                           |
| 6     | 6.27      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Delete Standard IXXX.6.3.8(3) and replace it with a requirement for any development or subdivision that includes the construction of new roads, or the upgrade of existing roads, to comply with a newly inserted Road Function and Design Elements table.                                                                                                                                                                                                                                                                                               |
| 6     | 6.28      | Auckland Transport | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Standard IXXX.6.3.8 to require Grand Drive West to be constructed to the western boundary of the plan change area.                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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| 6     | 6.29      | Auckland Transport              | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Standard IXXX.6.3.8(4) as follows:<br><i>Vehicle Crossings Access Restrictions</i><br>(4) <i>Subdivision must be designed in compliance with the Standard IXXX.6.2.7 Vehicle Access Restriction . <del>E27.6.4.1(3)</del> applies to the site boundaries along the Indicative Future Arterial shown on Precinct Plan 1. No vehicle crossings are allowed off the Indicative Future Arterial.</i>                                                                                                           |
| 6     | 6.30      | Auckland Transport              | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Standard IXXX.6.3.8(5) (including the associated subheading) and / or Precinct Plan 1 to ensure that there is consistent terminology used within the precinct provisions when referring to the shared cycle / footpath.                                                                                                                                                                                                                                                                                    |
| 6     | 6.31      | Auckland Transport              | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Standard IXXX.6.3.8(5) to replace the requirement for a shared path with requirements for separated cycle and pedestrian facilities which meet current AT standards to be provided adjacent to Grand Drive where AT is the relevant road controlling authority. Require safe crossing facilities be provided to connect the new facility with the existing shared path on the south-eastern corner of the Grand Drive / Arran Drive intersection.                                                          |
| 6     | 6.32      | Auckland Transport              | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Standard IXXX.8.1 and Standard IXXX.9 to include matters of discretion and associated assessment criteria for subdivision and development that address transport matters. The assessment matters should address:<br>•Transport including the development of an integrated road network<br>•Location and design of roads<br>•Provision of cycling and pedestrian networks<br>•Consistency with Precinct Plan 1<br>•Connections to adjacent sites<br>•Stormwater infrastructure and devices within the road. |
| 6     | 6.33      | Auckland Transport              | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend IXXX.9 to include a new special information requirement as follows:<br><i>(x) Monitoring of compliance with Standard IXXX.6.3.8(5)</i><br><i>Any proposal for construction of dwellings must demonstrate compliance with Standard IXXX.6.3.8(5) relating to completion of the shared use path. This includes providing information about the number of dwellings already completed and / or consent within the Precinct.</i>                                                                               |
| 6     | 6.34      | Auckland Transport              | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Explain the purpose of showing on Precinct Plan 1 the [statement] 'access to future development lots from paper road'. The annotation should either be explained in precinct provisions, or deleted from the precinct plan.                                                                                                                                                                                                                                                                                      |
| 6     | 6.35      | Auckland Transport              | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Clarify whether the 'indicative recreation open space' annotated on Precinct Plan 1 is more correctly labelled as 'indicative green pedestrian corridor'. This would be consistent with Precinct Plan 2. Also make any amendments needed to ensure that terminology used in Precinct Plan 1 is consistent with that used in Standard IXXX.6.3.8, particularly in relation to pedestrian connections and infrastructure.                                                                                          |
| 6     | 6.36      | Auckland Transport              | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Amend Precinct Plan 2 to remove the 'Indicative specimen trees'.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 7     | 7.1       | NZ Transport Agency Waka Kotahi | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | The applicant needs to demonstrate that NZTA P46 stormwater standards will not be measurably compromised, and that the additional impoundment (flood levels) will not adversely impact on the resilience of the NZTA fill embankment, culvert systems, and stormwater pond.                                                                                                                                                                                                                                      |
| 7     | 7.2       | NZ Transport Agency Waka Kotahi | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | That the shared path across the motorway be constructed as construction commences on future stages of Ara Hills.                                                                                                                                                                                                                                                                                                                                                                                                 |
| 7     | 7.3       | NZ Transport Agency Waka Kotahi | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | That the traffic model is updated to reflect recent counts and demographic information, and that cumulative scenarios including other recently complete, approved, or planned developments are run to enable analysis of potential effects on the operational and network performance of both the interchange and the surrounding local network.                                                                                                                                                                 |
| 7     | 7.4       | NZ Transport Agency Waka Kotahi | <a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a> | Because of the single motorway interchange access, that the ITA include an assessment of operations and resilience under incident scenarios, factoring in cumulative traffic from other recent and approved developments.                                                                                                                                                                                                                                                                                        |
| 8     | 8.1       | Vineway Ltd                     | madeleine.wright@millslane.co.nz<br>Andrew.as@mylandpartners.com           | The NoR 6 road in the PC 119 site and shown on the PC 119 proposed plans needs to match the NoR 6 concept plan at this point.                                                                                                                                                                                                                                                                                                                                                                                    |
| 8     | 8.2       | Vineway Ltd                     | madeleine.wright@millslane.co.nz<br>Andrew.as@mylandpartners.com           | The road connection to Grand Drive should not be referred to as a "future" arterial and the "restricted vehicle access" notation should be deleted.                                                                                                                                                                                                                                                                                                                                                              |

**Plan Change 119 (Private): Ara Hills (Hall Farm)**

**Summary of Decisions Requested**

| Sub # | Sub Point | Submitter Name                  | Address for Service                                                | Summary of Decisions Requested                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------|-----------|---------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8     | 8.3       | Vineway Ltd                     | madeleine.wright@millslane.co.nz<br>Andrew.as@mylandpartners.com   | Amend the precinct to require the following:<br>- the part of the NoR 6 road traversing the PC 119 site up to the PC 119 site's western boundary (referred to in the resource consent and the relevant plan as Road 1) "to be formed"<br>- a pedestrian/cycle bridge across SH1 to Grand Drive and Arran Drive<br>- A requirement for a new left turn lane on the northbound offramp.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8     | 8.4       | Vineway Ltd                     | madeleine.wright@millslane.co.nz<br>Andrew.as@mylandpartners.com   | Redesign the road network to clarify the connections on the western and southern boundaries with the Delmore site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 8     | 8.5       | Vineway Ltd                     | madeleine.wright@millslane.co.nz<br>Andrew.as@mylandpartners.com   | Amend the zoning on the northern, western and southern boundaries to Open Space Zone.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8     | 8.6       | Vineway Ltd                     | madeleine.wright@millslane.co.nz<br>Andrew.as@mylandpartners.com   | Extend the Nukumea Reserve Protection Sub-precinct at the northern boundary with the Nukumea Reserve.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8     | 8.7       | Vineway Ltd                     | madeleine.wright@millslane.co.nz<br>Andrew.as@mylandpartners.com   | Provide an assessment of the NPS-IB in relation to the Nukumea SEA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 8     | 8.8       | Vineway Ltd                     | madeleine.wright@millslane.co.nz<br>Andrew.as@mylandpartners.com   | Carry out a geomorphic risk assessment for waterways.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8     | 8.9       | Vineway Ltd                     | madeleine.wright@millslane.co.nz<br>Andrew.as@mylandpartners.com   | Provide updated water and wastewater servicing information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 8     | 8.10      | Vineway Ltd                     | madeleine.wright@millslane.co.nz<br>Andrew.as@mylandpartners.com   | Provide for 1% AEP attenuation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 8     | 8.11      | Vineway Ltd                     | madeleine.wright@millslane.co.nz<br>Andrew.as@mylandpartners.com   | Provide updated iwi consultation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 9     | 9.1       | AV Jennings Hobsonville Pty Ltd | <a href="mailto:andrew@telawyers.co.nz">andrew@telawyers.co.nz</a> | Remove MDRS provisions including:<br>(a) References to MDRS in the zone description;<br>(b) Policy 19;<br>(c) Table IXXX.4.4 Activity table – Residential Density Standards - MDRS (Mixed Housing Urban Zone and Residential – Terrace Housing and Apartment Buildings Zone);<br>(d) IXXX.6.1.3 Building height;<br>(e) IXXX.6.1.4 Height in relation to boundary;<br>(f) IXXX.6.1.5 Yards (except standard for riparian yards should apply in the I553 Orewa 4 Precinct);<br>(g) IXXX.6.1.6 Building coverage;<br>(h) IXXX.6.1.7 Landscaped area;<br>(i) IXXX.6.1.8 Outlook space;<br>(j) IXXX.6.1.10 Outdoor living space;<br>(k) IXXX.6.1.10 Windows facing the street;<br>(l) IXXX.6.3.2 Standards for controlled subdivision activities;<br>(m) I553 6.1.8 Mixed Housing Urban Zone (1-3 Dwellings Only and not within the Nukumea Precinct overlay);<br>(n) I553. 7 Assessment – controlled activities;<br>(o) I553.8 Assessment – restricted discretionary activities and<br>(p) I553.8.2 Assessment Criteria. |

Plan Change 119 (Private): Ara Hills (Hall Farm)

Summary of Decisions Requested

| Sub # | Sub Point | Submitter Name                                    | Address for Service                                                | Summary of Decisions Requested                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------|-----------|---------------------------------------------------|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9     | 9.2       | AV Jennings Hobsonville Pty Ltd                   | <a href="mailto:andrew@telawyers.co.nz">andrew@telawyers.co.nz</a> | Support the Precinct provisions (Precinct description, Objective (2), Policy (17), Table IXXX.4.1 All zones (A2) (A5) (A7), Standard IXXX.6.2.6 Bulk Water Supply and Wastewater Infrastructure) proposed by Watercare provided that there is confirmation that the provisions will be applied in the manner outlined in this submission and otherwise amend the provisions to reflect this submission.                                                                                                                                                                                                                                                                                                                                                              |
| 9     | 9.3       | AV Jennings Hobsonville Pty Ltd                   | <a href="mailto:andrew@telawyers.co.nz">andrew@telawyers.co.nz</a> | Amend Objective IXXX.2(10) as follows:<br><i>The design of the neighbourhood centre takes account of the <del>future</del> arterial road <del>connection</del> <u>corridor</u> through the Precinct to safeguard this future connection in the wider Orewa West area.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 9     | 9.4       | AV Jennings Hobsonville Pty Ltd                   | <a href="mailto:andrew@telawyers.co.nz">andrew@telawyers.co.nz</a> | Amend Policy IXXX.3(4) as follows:<br><i>The design and built form of the neighbourhood centre must take account of the <del>future</del> arterial road corridor and incorporate restricted vehicle access as shown on Precinct Plan 1.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 9     | 9.5       | AV Jennings Hobsonville Pty Ltd                   | <a href="mailto:andrew@telawyers.co.nz">andrew@telawyers.co.nz</a> | Amend Policy IXXX.3(8) as follows:<br><i>Locate, construct and vest the indicative road layout and transport upgrades, including pedestrian linkages and cycleways and safeguard the <del>future</del> arterial road corridor, ...</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 9     | 9.6       | AV Jennings Hobsonville Pty Ltd                   | <a href="mailto:andrew@telawyers.co.nz">andrew@telawyers.co.nz</a> | Amend Standard IXXX.6.2.7 Vehicle Access Restriction as follows:<br><i>Purpose: To safeguard the <del>future</del> arterial status of Grand Drive <u>West corridor</u> and ensure vehicle and pedestrian safety. (1) Standard E27.6.4.1(3) applies to all the site boundaries along the frontage of Grand Drive <u>West</u>. No vehicle crossings are allowed off Grand Drive <u>West</u>.</i>                                                                                                                                                                                                                                                                                                                                                                       |
| 9     | 9.7       | AV Jennings Hobsonville Pty Ltd                   | <a href="mailto:andrew@telawyers.co.nz">andrew@telawyers.co.nz</a> | Amend Standard IXXX.6.3.8 Subdivision standards for Roding and Access as follows:<br><i>(4) Standard E27.6.4.1(3) applies to the site boundaries along <u>Grand Drive West</u> <del>the Indicative Future Arterial</del> shown on Precinct Plan 1. No vehicle crossings are allowed off <u>Grand Drive West</u> <del>the Indicative Future Arterial</del></i>                                                                                                                                                                                                                                                                                                                                                                                                        |
| 9     | 9.8       | AV Jennings Hobsonville Pty Ltd                   | <a href="mailto:andrew@telawyers.co.nz">andrew@telawyers.co.nz</a> | Amend the Precinct Plans to remove the unformed or 'paper road' part of Grand Drive West from the Precinct as follows and as shown on Figure 1:<br>(a) The Legend is changed from "Indicative Future Arterial Rd" to "Existing Grand Drive West".<br>(b) Shorter black and orange dashed lines such that the Grand Drive West does not connect to the notified Precinct western boundary, reflecting the actual extent of constructed road and shared path.<br>(c) The Precinct Plans are amended to remove the area of vested paper road subject to NoR 6 from the Precinct, bringing a small part of the boundary eastward.<br>(d) amend other precinct plans accordingly<br> |
| 9     | 9.9       | AV Jennings Hobsonville Pty Ltd                   | <a href="mailto:andrew@telawyers.co.nz">andrew@telawyers.co.nz</a> | Refer to NoR 6, to the extent necessary, to reference any future extension and construction of the Arterial Road.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 9     | 9.10      | AV Jennings Hobsonville Pty Ltd                   | <a href="mailto:andrew@telawyers.co.nz">andrew@telawyers.co.nz</a> | Recognising the proposed vegetated areas within the Precinct Plan as deep soil areas.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 10    | 10.1      | Te Tāhuhu o te Mātauranga   Ministry of Education | <a href="mailto:eden.rima@beca.com">eden.rima@beca.com</a>         | Retain Objective 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

**Plan Change 119 (Private): Ara Hills (Hall Farm)**

**Summary of Decisions Requested**

| Sub # | Sub Point | Submitter Name                                    | Address for Service                                        | Summary of Decisions Requested                                                       |
|-------|-----------|---------------------------------------------------|------------------------------------------------------------|--------------------------------------------------------------------------------------|
| 10    | 10.2      | Te Tāhuhu o te Mātauranga   Ministry of Education | <a href="mailto:eden.rima@beca.com">eden.rima@beca.com</a> | Retain Objective 5                                                                   |
| 10    | 10.3      | Te Tāhuhu o te Mātauranga   Ministry of Education | <a href="mailto:eden.rima@beca.com">eden.rima@beca.com</a> | Retain Objective 6                                                                   |
| 10    | 10.4      | Te Tāhuhu o te Mātauranga   Ministry of Education | <a href="mailto:eden.rima@beca.com">eden.rima@beca.com</a> | Retain Objective 10                                                                  |
| 10    | 10.5      | Te Tāhuhu o te Mātauranga   Ministry of Education | <a href="mailto:eden.rima@beca.com">eden.rima@beca.com</a> | Retain Policy 8                                                                      |
| 10    | 10.6      | Te Tāhuhu o te Mātauranga   Ministry of Education | <a href="mailto:eden.rima@beca.com">eden.rima@beca.com</a> | Consider a new local road from the PCA [plan change area] to Nukumea Primary School. |
| 10    | 10.7      | Te Tāhuhu o te Mātauranga   Ministry of Education | <a href="mailto:eden.rima@beca.com">eden.rima@beca.com</a> | Consider greater active mode connections to Orewa College.                           |

## **Submissions**

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Submission No:

Receipt Date:

## Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full Name)

Dr Craig Jefferies and Dr Lalita Jefferies

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

Telephone:

21957877

Email:

Dr\_bear\_toronto@yahoo.ca

Contact Person: (Name and designation, if applicable)

## Scope of submission

**This is a submission on the following proposed plan change / variation to an existing plan:**

Plan Change/Variation Number

PC 119 (Private)

Plan Change/Variation Name

Ara Hills (Hall Farm)

**The specific provisions that my submission relates to are:**

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

Or

Map

Or

**Other (specify)**

Multiple: Zone map, precinct plans, precinct provisions particularly IXXX.6.1 Residential Standards and 1XXX.6.2 Precinct Standards  
Multiple: Zone map, precinct plans, precinct provisions particularly IXXX.6.1 Residential Standards and 1XXX.6.2 Precinct Standards

## Submission

**My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)**

I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☐

I wish to have the provisions identified above amended Yes ☒ No ☐

The reasons for my views are:

See PDF attached.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

Accept the proposed plan change / variation with amendments as outlined below ☒

Decline the proposed plan change / variation ☐

If the proposed plan change / variation is not declined, then amend it as outlined below. ☐

Finer grain application of residential zoning in rather than proposed MHU zoning. 1.1

Amend IXXX.6 (3)(b) to include H6.6.5 (Residential - Terraced Housing and Apartment Building Zone Building Height Standard) 1.2

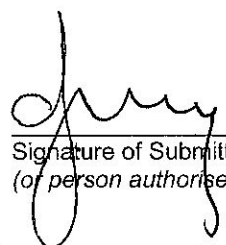
Amend IXXX.6.2.4 to strengthen clarity and avoid perverse outcomes such as multi-storied drive-through convenience retail. Suggest addition of rules around frontage and pedestrian amenity. 1.3

Clarify relationship between additional controls in The Ara Hills Home Design Guides and MDRS. 1.4

I wish to be heard in support of my submission ☐

I do not wish to be heard in support of my submission ☐

If others make a similar submission, I will consider presenting a joint case with them at a hearing ☒

  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

08/27/2025

Date

#### Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐ /could not ☒ gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am ☐ / am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

The reasons for my views are as follows:

Rezoning:

- Proposed Residential – Terraced Housing and Apartment zoning enables development significantly more intensive than the masterplan used in the marketing document which informed our decision making.
- The introduction of the additional households and neighbourhood centre without the known and appropriately phased timing of the rapid transit bus hub and complementary car-parking indicated in the original resource consent may create major parking and traffic congestion effects as seen in other Auckland neighbourhoods where residential up-zoning precedes the delivery of key infrastructure.
- The blanket application of the Residential – Mixed Housing Urban zone to the existing, finer grained residential zoning will have major effects on the existing character and amenity of the area. Particularly regarding traffic, noise, sunlight access, and bulk and massing effects.
- The rationale for including a residential – terraced housing and apartment building zone when IXXX.2 Objectives specifies a urban built character of three-storeys, as enabled in the residential – mixed housing urban zone is unclear.
- Clarification is required regarding the relationship between the existing Ara Hills Home Design Guidelines and the MDRS.

Precinct:

- Clarification is required around the following aspect of the new precinct:  
*requiring all open space to be accessible to the public even though most of it will be owned and managed by the residents;* 1.5
- Upzoning to business – neighbourhood centre, with the flexible sub-precinct in the neighbour residential – terrace housing and apartment building zone could result in frequent a high number of non-resident users in the open space. Who will be responsible for increased maintenance costs?
- Clarification is required for the Flexible Commercial Sub-precinct. The activity table for this precinct is currently vague and vulnerable to perverse outcomes such as multi-story drive-through convenience retail as is now occurring in other areas of Auckland. The delivery of mixed-use, residential above/commercial below typologies is challenging in Auckland and this approach risks making car-oriented convenience activities more permissive. This is particularly concerning due to the sub-precinct's proximity to a motorway off-ramp.

Specific provisions:

- IXXX.6 (3) (b): It is unclear why the residential – terraced housing and apartments standard H6.6.5 Building Height is not also included in the list of activities which do not apply.
- IXXX.6.2.4: The flexible commercial sub-precinct needs greater guidance for activities to ensure they achieve outcomes which prioritise pedestrians and co-benefits such as active frontages and passive surveillance.

Positive effects:

- Neighbourhood scale, pedestrian oriented, fine grain retail and community services as depicted in indicative drawings in the original resource consent.
- Provision of diverse housing opportunities.
- Proposed upgrades to open spaces and stormwater infrastructure.

Negative effects:

- Change in character from existing community and design indicated in original masterplan.
- Increased parking pressure and road congestion including the potential for parking provision to overwhelm positive aspects of streetscape design.
- Loss of amenity if infrastructure does not keep up with pace of growth
- Potential for community to set precedent enabling sprawl into areas north and west of the existing community.
- Overshadowing, bulk, mass, noise, stormwater, landscape and visual amenity, and parking effects on existing community is proposed upzoning occurs.

**From:** [rodsgarage@xtra.co.nz](mailto:rodsgarage@xtra.co.nz)  
**To:** [Unitary Plan](#)  
**Subject:** FW: Objection to plan change 119  
**Date:** Thursday, 18 September 2025 12:45:08 pm

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**From:** rod harman <rodharman@outlook.co.nz>  
**Sent:** Thursday, 18 September 2025 12:27 pm  
**To:** rodsgarage@xtra.co.nz  
**Subject:** Objection to plan change 119

Attachment "A"

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland

Email [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

Objection to Plan Change 119 (Private)

I am the landowner at 55 Russell Road, Wainui that adjoins the Ara Hills subdivision. The general reasons why I wish to express my objection to Private Plan Change 119 are as follows: -

Campbell Brown Planning Report dated 29 July 2025

1. The application is inconsistent with the contents of Appendix 1: Structure Plan Guidelines (Regional Policy Statement)  
Structure plans are important for establishing land use, transport and services network for the entire area given multiple owners. Guidelines include there be appropriate transitions between and at the edge of the structure plan area between different land use activities, intensities and densities. There is a lack of structure planning that extends beyond the applicant's own legal boundary, and topographically west and south towards Milldale. This must be addressed.
2. No Integrated Transport Corridor connection  
As the adjoining landowner, I provided the applicant signed consent on 15 January 2019 to a road stopping that connected unformed road to the northeast boundary at 55 Russell Road. My consent was provided on the basis that a road connection with Grand Drive would be provided. Since the road stopping gazette notice in 2024, there has been little within this application to provide for a replacement road connection or expressly show plans confirming transport corridor and services connections. This must be included.
3. In the Campbell Brown Planning Report pages 78-79 states the relevant objectives and policies in E27 of the Unitary Plan seeks to ensure "An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for". This application falls short of achieving the required stated objective.
4. The planning report fails to adequately provide an integrated transport network when referring to the Notice of Requirement (NOR 6) on pages 23-25. NOR 6 was confirmed by AT on 9 December 2024 and extends into the Ara Hills subdivision. The applicants' own plans to integrate this with the required transport and services network fall silent, and this needs to be addressed.

#### Flow Integrated Transport Assessment dated July 2025

5. Summary and conclusions on Page 31 of the Flow Integrated Traffic Assessment do not adequately show the integrated transport network plans needed for the combined Structure and/or Precinct.
6. Given the recent NOR 6 designation and future arterial connection, the Flow assessment does not show the arterial connection for the entire area. The report is incomplete here.
7. We observe that Appendix B responses to Council in 2023 and parts of the report is outdated given the NOR 6 designation and other matters since that time.

#### Relief Sought

8. That the applicant be required to consult with landowners for the purpose of recording agreements as to location of future infrastructure connections for roading, wastewater, water supply, stormwater and overland flowpaths in a manner that is binding on the landowner, and which gives certainty of access to future neighbouring landowners. **2.1**
9. In the absence of a structure plan for the entire Future Urban Zoned area, rules or conditions must be imposed to prevent future owners of the application land from frustrating development of adjoining areas. **2.2**
10. The applicant must form the road to the western boundary of 55 Russell Road as required under Resource Consent bundle BUN20441333, LUC60010513-J and SUB60035991-J and as shown in the general arrangement for the NOR6 designation. **2.3**

Rod Harman  
55 Russell Rd, RD2  
Silverdale  
Email [rodsgarage@xtra.co.nz](mailto:rodsgarage@xtra.co.nz)

### Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only  
Submission No:  
Receipt Date:

#### Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

Rodney Harman

Organisation Name (if submission is made on behalf of Organisation)

#### Address for service of Submitter

55 Russell Road, Waiwae

RD2 Silverdale Auckland

Telephone:  Email:

Contact Person: (Name and designation, if applicable)

#### Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

Plan Change/Variation Name

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

#### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above ☐

I oppose the specific provisions identified above ☐

I wish to have the provisions identified above amended Yes ☐ No ☐

The reasons for my views are:  
 My reasons for opposing Plan Change 119 (Private) are provided on the attached pages marked Attachment "A".  
 I ask these matters be addressed in this application.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

Accept the proposed plan change / variation with amendments as outlined below ☐

Decline the proposed plan change / variation ☐

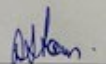
If the proposed plan change / variation is not declined, then amend it as outlined below. ☐

Refer to Attachment "A"

I wish to be heard in support of my submission ☐

I do not wish to be heard in support of my submission ☐

If others make a similar submission, I will consider presenting a joint case with them at a hearing ☐

Rodney Harman   
 Signature of Submitter  
 (or person authorised to sign on behalf of submitter)

18-9-25.  
 Date

**Notes to person making submission:**  
 If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

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I could ☐ / could not ☐ gain an advantage in trade competition through this submission.  
 If you could gain an advantage in trade competition through this submission please complete the following:

I am ☐ / am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and  
 (b) does not relate to trade competition or the effects of trade competition.

Sent from my iPhone

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## Form 5: Submission on notified proposal for policy statement or plan, change or variation

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*Pursuant to clause 6 of the First Schedule of the Resource Management Act 1991*

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**To:** Auckland Council

**Name of submitter:** Director-General of Conservation (the **Director-General**)

1. This is a submission on Proposed Private Plan Change 119: **Ara Hills (Hall Farm)**
2. I could not gain an advantage in trade competition through this submission.
3. The **Director-General** represents relevant aspects of public interest and has interest in the proposal that is greater than the interest the general public. The Director-General has all the powers reasonably necessary to enable the Department of Conservation to perform its functions<sup>1</sup>. The Conservation Act 1987 (the CA) sets out the Department's functions which include (amongst other things) management of land and natural and historic resources for conservation purposes, preservation so far as is practicable of all indigenous freshwater fisheries, protection of recreational freshwater fisheries and freshwater fish habitats and advocacy for the conservation of natural resources and historic heritage<sup>2</sup>. Section 2 of the CA defines 'conservation' to mean 'the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations'.
4. The specific provisions of the proposal that my submission relates, and the detailed decisions sought to are set out in **Attachment 1** to this submission.
5. I **seek** the following decision from the Council:

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<sup>1</sup> Refer section 53 Conservation Act 1987.

<sup>2</sup> Conservation Act 1987, section 6.

- a. That the particular provisions of Proposed Private Plan Change 119 that I support, as identified in Attachment 1, are retained;
  - b. That the amendments, additions and deletions to Proposed Private Plan Change 119 sought in Attachments 1 are made; and
  - c. Further or alternative relief to like effect to that sought in 4. a. and 4. b. above.
6. The decisions sought in this submission are required to ensure that the Private Plan Change 119:
- a. Gives effect to the National Policy Statement for Indigenous Biodiversity 2023 and the National Policy Statement for Freshwater Management 2020.
  - b. Recognises and provides for the matters of national importance listed in section 6 of the Act and has particular regard to the other matters in section 7 of the Act;
  - c. Promotes the sustainable management of natural and physical resources; and
  - d. The changes sought are necessary, appropriate and sound resource management practice.
7. I do not wish to be heard in support of my submission.



Linda Kirk

Acting RM Regulatory Delivery Manager

Department of Conservation

Acting pursuant to delegated authority on behalf of the Director-General of Conservation

Date: 18 September 2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

**Address for service:**

Attn: Christina Schipper, Resource Management Planner

cschipper@doc.govt.nz and cc to: [RMA@doc.govt.nz](mailto:RMA@doc.govt.nz)

+027 254 0683

Department of Conservation

Level 1, John Wickliffe House

265 Princes Street, 9016

Dunedin

ATTACHMENT 1:

PRIVATE PLAN CHANGE 119: ARA HILLS (HALL FARM)  
SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION

The Chapters that my submission relates to are set out in the table below. My submissions are set out immediately following these headings, together with the reason and the decision I seek from the Council.

The decision that has been requested may suggest new or revised wording for identified sections of the proposed plan. This wording is intended to be helpful but alternative wording of like effect may be equally acceptable. Text quoted from Proposed Plan Change 119 is shown in *Italics*. The wording of relief sought shows new text as underlined and original text to be deleted as ~~strikethrough~~.

Unless specified in each-submission point, my reasons for supporting are that the provisions are consistent with the purposes of the Act.

| PLAN PROVISION                                                                      | SUPPORT/OPPOSE | REASON                                                                                                                                                                                                         | RELIEF SOUGHT                               |     |
|-------------------------------------------------------------------------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|-----|
| General comment                                                                     | Support        | The DG is supportive of the private plan change provisions to protect the nearby Nukumea Scenic reserve and its intrinsic values.                                                                              | Retain as notified, except as sought below. | 3.1 |
| IXXX.2 Objectives (3), (4), (8), and (13).                                          | Support        | The objectives give effect to section 6(c) of the Resource Management Act 1991, the National Policy Statement on Freshwater Management 2020 and the National Policy Statement on Indigenous Biodiversity 2023. | Retain as notified.                         | 3.2 |
| IXXX.3 Policies (5), (6), (7), (11), (12), and (13).                                | Support        | The objectives give effect to section 6(c) of the Resource Management Act 1991, the National Policy Statement on Freshwater Management 2020 and the National Policy Statement on Indigenous Biodiversity 2023. | Retain as notified                          | 3.3 |
| All Zones: Activity Use (Rule A1)                                                   | Support        | Prohibiting mustelids, rodents, or cats within the precinct as a rule is appropriate for the entire site due to the large roaming range of the animals stated.                                                 | Retain as notified.                         | 3.4 |
| Table IXXX.4.2 Mixed Housing Urban – Nukumea Scenic Reserve Protection Sub-precinct | Support        | The rules are appropriate for protecting the values of the Nukumea Scenic Reserve Protection sub-precinct.                                                                                                     | Retain as notified.                         | 3.5 |

|                                                                                              |                |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------------------------------|----------------|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>IXXX.6.2.3 Standards relating to sites within the Nukumea Scenic Reserve Sub-precinct</p> | <p>Support</p> | <p>The standard appropriately recognises and protects the values of the Nukumea Scenic Reserve Sub-precinct.</p> | <p>Retain as notified but amend minor formatting issue where paragraph 3 is included in paragraph 2, and re-number the additional provisions as necessary:</p> <ul style="list-style-type: none"> <li>(1) All buildings on a site within the Nukumea Reserve Protection Sub-precinct must be located greater than 20m from the shared Nukumea Reserve boundary as shown on Precinct Plan 1.</li> <li>(2) All buildings on a site that are not within the Nukumea Reserve Sub-precinct but share a boundary with the Nukumea Reserve must be located greater than 10m from the shared Nukumea Reserve boundary as shown on Precinct Plan 1. The 10m buffer area must be planted in native eco- sourced vegetation.</li> <li>(3) A minimum of 60 per cent of the net site area of a site within the Nukumea Scenic Reserve Protection Sub-precinct must be planted in native eco- sourced vegetation and must include the 20 metre wide planted buffer area shown on Precinct Plan 1 and Precinct Plan 2. The planting, weed management and plant maintenance must be undertaken in accordance with a Native Revegetation Planting Plan required under IXXX.9.1.</li> <li>(4) <del>(3)</del> Any minor dwellings on a site in the Nukumea Scenic Reserve Protection Subprecinct must: <ul style="list-style-type: none"> <li>(a) Comply with Standard H3.6.4 (Minor Dwellings);</li> <li>(b) be physically connected to the main dwelling and</li> <li>(c) comply with IXXX.6.2.3(1).</li> </ul> </li> <li>(5) <del>(4)</del> The maximum building coverage on a site within the Nukumea Scenic Reserve Protection Sub-precinct</li> </ul> |
|----------------------------------------------------------------------------------------------|----------------|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

3.6

| PLAN PROVISION                                                                                | SUPPORT/OPPOSE | REASON                                                                                                    | RELIEF SOUGHT                                                                                  |      |
|-----------------------------------------------------------------------------------------------|----------------|-----------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|------|
|                                                                                               |                |                                                                                                           | must not exceed 20 per cent of the net site area or 400m <sup>2</sup> whichever is the lesser. |      |
| IXXX.6.3.3 Subdivision standards for sites within the Nukumea Reserve Protection Sub-precinct | Support        | The standard appropriately recognises and protects the values of the Nukumea scenic reserve sub-precinct. | Retain as notified.                                                                            | 3.7  |
| IXXX.6.3.4 Subdivision standards for riparian margins                                         | Support        | The standard appropriately recognises and protects the values of the Nukumea scenic reserve sub-precinct. | Retain as notified.                                                                            | 3.8  |
| IXXX.6.3.5 Subdivision standards for ecological connections                                   | Support        | The standard appropriately recognises and protects the values of the Nukumea scenic reserve sub-precinct. | Retain as notified.                                                                            | 3.9  |
| IXXX.9.1- Native Revegetation Planting Plan                                                   | Support        | The standard appropriately recognises and protects the values of the Nukumea scenic reserve sub-precinct. | Retain as notified.                                                                            | 3.10 |

**From:** [UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 119 - Fire and Emergency New Zealand  
**Date:** Friday, 19 September 2025 9:15:41 am  
**Attachments:** [Fire and Emergency - Auckland Council - PPC119 - SUBMISSION FINAL.pdf](#)

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Fire and Emergency New Zealand

Organisation name:

Agent's full name:

Email address: [eva.mason@beca.com](mailto:eva.mason@beca.com)

Contact phone number: 093009300

Postal address:  
124 Halsey Street  
Auckland Central  
Auckland 1142

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 119

Plan change name: PC 119 (Private) - Ara Hills (Hall Farm)

**My submission relates to**

Rule or rules:

Property address: Private Plan Change 119 - Ara Hills

Map or maps:

Other provisions:  
See submission.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
See submission.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: See submission.

Submission date: 19 September 2025

Supporting documents  
[Fire and Emergency - Auckland Council - PPC119 - SUBMISSION FINAL.pdf](#)

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



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## Form 5

### Submission on private plan change 119

Clause 6 of Schedule 1, Resource Management Act 1991

By email to: unitaryplan@aucklandcouncil.govt.nz

**To:** Auckland Council

**Submission on:** Private Plan Change 119 Ara Hills

**Name of Submitter:** Fire and Emergency New Zealand

**Address for Service:** Beca Limited  
124 Halsey Street,  
Auckland Central,  
Auckland 1142  
  
Attention: Eva Mason  
Ph: +64 9 300 9300  
Email: Eva.Mason@beca.com

This neutral submission is made on behalf of Fire and Emergency New Zealand (**Fire and Emergency**) to Auckland Council on Private Plan Change 119 – Ara Hills (**PPC119**) to the Auckland Unitary Plan: Operative in Part 2016 (**AUP**).

#### 1. Background:

Fire and Emergency's objectives and functions are set out in the Fire and Emergency New Zealand Act 2017.

Fire and Emergency's principal objectives are to reduce the incidence of unwanted fire and the associated risk to life and property. Fire and Emergency's other principal objectives are to:

- protect and preserve life,
- prevent or limit injury,
- prevent or limit damage to property and land, and
- prevent or limit damage to the environment<sup>1</sup>.

Fire and Emergency's main functions<sup>2</sup> are:

- (a) to promote fire safety, including providing guidance on the safe use of fire as a land management tool; and
- (b) to provide fire prevention, response, and suppression services; and
- (c) to stabilise, or render safe, incidents that involve hazardous substances; and

<sup>1</sup> Fire and Emergency New Zealand Act 2017 section 10(a) and (b)

<sup>2</sup> Fire and Emergency New Zealand Act 2017 section 11(2)

- (d) to provide for the safety of persons and property endangered by incidents involving hazardous substances; and*
- (e) to rescue persons who are trapped as a result of transport accidents or other incidents; and*
- (f) to provide urban search and rescue services.*

Fire and Emergency also has additional functions<sup>3</sup> to assist in matters to the extent that Fire and Emergency has the capability and capacity to do so and the capability to perform its main functions efficiently and effectively.

With the wider mandate and changing nature of Fire and Emergency responses, the volume of incidents that Fire and Emergency responds to has grown, as has the range of incident types.<sup>4</sup>

Fire and Emergency also faces broad challenges, such as the increasing frequency and severity of extreme weather events, increasing intensification of urban areas, and competing access to resources such as water and transport infrastructure. These challenges make the environment Fire and Emergency operates in more complex and puts greater demands on Fire and Emergency as an organisation.

Territorial authorities and developers have an important role in ensuring that Fire and Emergency, as an emergency service provider, can continue to operate effectively and efficiently in a changing urban environment. As such, Fire and Emergency has an interest in PPC119 - which seeks to rezone 84ha west of Grand Drive Orewa from Future Urban to several urban zones and insert new *Orewa 4 Precinct* provisions for this land into the AUP to ensure that, where necessary, appropriate consideration is given to fire safety and Fire and Emergency's operational requirements.

### **1.1 Fire and Emergency's interests:**

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. To achieve this objective Fire and Emergency requires adequate water supply be available for firefighting activities. It is critical for Fire and Emergency that water supply infrastructure is in place prior to any development commencing, and that this water supply has adequate capacity and pressure available to service the future growth area. This may be firefighting water sourced from a reticulated water supply network or, where reticulation is not provided, from alternative water sources. This may be in the form of dedicated water tanks or ponds for firefighting. Adequate physical access to this water supply for new development (whether reticulated or non-reticulated) is also essential.

The plan change area has underlying existing resource consents (BUN20441333, SUB60035991, LUC60010513) which were granted for the subdivision and development of up to 575 residential lots with conditions. Stages 1, 2, and 3A (comprising 220 lots and four commercial lots) have been constructed or are being constructed under these consents. However, further masterplanning for the site has since been undertaken and PPC119 proposes an increase to the total number of residential lots to approximately 900, representing an additional 325 units / dwellings. The plan change therefore seeks to enable the intensification of the site to provide for this increase.

Fire and Emergency had an interest in the original resource consent application and conditions were imposed on consent BUN20441333 which required the eventual development of the site to comply with New Zealand Fire Service Firefighting Water Supplies Code of Practice, SNZ PAS 4509: 2008 ('Code of Practice').

#### Relevant extracts from Decision ref. BUN20441333

<sup>3</sup> Fire and Emergency New Zealand Act 2017 section 12(3)

<sup>4</sup> There is an increasing need to respond to a wide range of non-fire emergencies, where Fire and Emergency often coordinate with and assist other emergency services. These include responding to motor vehicle accidents, medical callouts, technical rescues, hazardous substance incidents such as gas or chemical leaks, and accidents and other incidents at sea. In 2023/24, Fire and Emergency attended more medical emergencies than structure and vegetation fires combined (Source: Fire and Emergency New Zealand Annual Report 2023 / 24).

11. No construction activity shall commence on site until written confirmation of approval of the engineering plans and associated management plans has been obtained from the Team Leader...

13. The engineering plans are to include the following:

...

(u) Detailed design, for each stage, of the reticulated water supply network, to be provided in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008.

(v) Details of how development of roads and access ways will enable access for emergency vehicles for firefighting purposes in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008.

...

(w) Details of fire hydrants to be installed. Should fire hydrants be incorporated as part of the reticulated network, they must be placed on the footpath to enable unimpeded access for the New Zealand Fire Service and must be located within 135m of all lots in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008.

*Advice Note:*

*Should the applicant wish to undertake alternative methods of providing water supply for firefighting purposes such as sprinkler systems or water tanks, it is strongly recommended the NZFS are consulted prior to such concepts.*

...

14. As part of the application for Engineering Plan Approval for each stage, a chartered professional engineer must:

...

(c) Certify that the requirements of the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008 have been met.

These conditions were imposed to ensure that the development would be serviced by an adequate firefighting water supply and that access to all lots met Fire and Emergency's operational requirements. It is important to note that this requirement, and any related advice as part of the original consent, was based on the level of development proposed at that point in time.

Fire and Emergency has concerns regarding whether the further intensification of the site, proposed via PPC119, would still be able to be adequately serviced. Notwithstanding, at the very least, it is essential that the PPC119 provisions maintain the requirement for the eventual subdivision and development of the site requires future developers to comply with the Code of Practice for both firefighting water supply and access.

### 1.1.1 Operational requirements

#### Firefighting water supply

Within the proposed *Orewa 4 Precinct*, subdivision and development are restricted until the land within the precinct area is able to connect to a functioning bulk water supply and bulk wastewater infrastructure with sufficient capacity to service the development.

The PPC119 Appendix K: Engineering Report states that the existing potable water infrastructure is sufficient to service a portion of the precinct area, although a new Watercare storage reservoir is required to service the

additional growth proposed through PPC119. Whilst it is acknowledged that the plan change documentation (Appendix K) considers firefighting flow and pressure in accordance with the Code of Practice, there is no specific reference to firefighting water supply within the *Orewa 4 Precinct* provisions.

It is crucial that the conditions of any future resource consents within the *Orewa 4 Precinct* require compliance with the Code of Practice to ensure that an adequate firefighting water supply, and access to that supply, is provided as part of the development.

Therefore, it is recommended that specific provisions relating to the provision of firefighting water supply are included within the precinct provisions proposed by PPC119. The relief sought by Fire and Emergency is outlined in the table in **Attachment 1**.

For further detail on water supply requirements please refer to the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Water Supplies Code of Practice).

#### Emergency access

The Fire and Emergency Designers Guide to Firefighting Operations: Emergency Vehicle Access F5-02 GD provides guidance to ensure building designs comply with the New Zealand Building Code C5 – Access and safety for firefighting operations, Clause C5.6.

Fire and Emergency requires adequate access to new developments, associated buildings and the natural environment to ensure that it can respond in an emergency such as a fire, natural hazard, hazardous substances, medical or a rescue or assist. This includes both emergency vehicle access to the source of the emergency, as well as physical access by Fire and Emergency personnel to perform rescues and duties, which includes the use of lifesaving appliances such as ladders, hoses and stretchers.

Fire and Emergency considers it is vital for the health, safety and wellbeing of communities that the needs of emergency services are taken into account as new development is being planned. It is also important that future development areas such as *Orewa 4 Precinct* are designed to be well-functioning and resilient to ensure that communities are able to evacuate in the event of an emergency. If emergency response vehicles and/or personnel are not able to access people in the event of an emergency, this does not provide for well-functioning and resilient communities. In addition, limited access or inadequate infrastructure can place firefighters at significant personal risk, if they are operating in unsafe environments without sufficient water supply or escape routes.

For Fire and Emergency vehicles to access an emergency, adequate roading and accessway design is necessary to support the operational requirements of Fire and Emergency. The key requirements for emergency vehicle access are set out in the New Zealand Fire Service Firefighting Water Supplies Code of Practice (**SNZ PAS 4509:2008**) and F5-02 GD. The key access requirements are summarised below:

- To accommodate a Fire and Emergency vehicle, carriageways should have a minimum width of 4.0m. This can be reduced to a minimum width of 3.5m at entrances, provided tight turns are not required.
- Fire and Emergency needs vehicle access routes to have an unobstructed clearance height of at least 4.0m so that vehicles can pass through openings. This includes clearance from building construction, archways, gateways/doorways and overhanging structures (e.g., ducts, pipes, sprinklers, walkways, signs, structural beams, trees, hanging cables, etc.).
- Any carriageway with a dead end needs a turnaround area so that Fire and Emergency vehicles do not have to do multi-point turns to turn around. This is so Fire and Emergency personnel can move their vehicles quickly in an emergency. Fire and Emergency vehicles need to be able to turn a full 360° within a 25m circle (wall-to-wall clearance) to meet Waka Kotahi NZ Transport Agency requirements. The minimum turning radius of turnaround areas should be no less than 11.3m for pumping vehicles and 12.5m for aerial fire appliances.
- The maximum negotiable gradient is 1:5, but in general the roading gradient should not exceed 16%.

It is understood that Chapter E27 for Transport as part of the AUP:OP will be relied upon within the Precinct Provisions. This covers rules and standards for access, however access provisions for emergency services need to be referenced through the access provisions within the new Precinct (refer to **Attachment 1**).

Appendix K of PPC119 states that public roads that service over 200 lots will have a maximum 10% gradient, and any roads that service less than 200 lots must have a maximum of 12.5% gradient. Fire and Emergency is supportive of this as it complies with the F5-02 GD.

However, it is uncertain from the precinct plans how wide the proposed local roads and paper roads will be. This raises concerns for Fire and Emergency as the roads may potentially be too narrow for appliances, with little to no manoeuvring space. It is therefore important that the widths and gradients of these roads are constructed in accordance with F5-02 GD so that all lots, particularly those on the south-western area of the precinct, have suitable access for emergency services.

There is no reference to achieving suitable emergency access for Fire and Emergency New Zealand within the proposed precinct provisions. Therefore, it is recommended that further objectives, policies and standards are included within the plan which achieve suitable access for emergency services and ensure full compliance with F5-02-GD. The specific relief sought by Fire and Emergency is outlined in the table in **Attachment 1**.

## 2. Fire and Emergency seek the following decision from the local authority:

Fire and Emergency seeks that Auckland Council accept the amendments sought in **Attachment 1**.

**Attachment 1** sets out the details of Fire and Emergency's submission, including the relief sought by Fire and Emergency to specific provisions in PPC119, and the reasons for the amendments.

**Fire and Emergency wishes to be heard in support of its submission.**

**If others make a similar submission, Fire and Emergency will consider presenting a joint case with them at a hearing.**



Eva Mason, Planning consultant

Signature of person authorised to sign on behalf of

**Fire and Emergency**

**Date:**

19/09/25

## Attachment 1 – Relief sought by Fire and Emergency

The following table sets out the specific submission and amendments sought by Fire and Emergency. Where specific amendments to provisions of PPC119 are sought, these amendments are shown as red underline (for new text sought) and ~~word~~ (for deletion).

| Provision                                      | Submission                                                                                                                                                                                                                                                                                                                        | Relief sought                                                                                                                                                                                                                                                                   |     |
|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| <b>Objectives</b>                              |                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                 |     |
| IXXX.2 (2)                                     | <b>Support in part</b><br>Fire and Emergency is supportive of ensuring subdivision and development within the precinct is coordinated with water supply. It is essential, however, that the Precincts' objectives and associated rules are drafted to deliver sufficient infrastructure which includes firefighting water supply. | Amend as follows:<br>Subdivision and development is coordinated with the provision of bulk and local water supply, <u>firefighting water supply</u> , and wastewater infrastructure and the Stormwater Management Plan.                                                         | 4.1 |
| IXXX.2 (13)                                    | <b>New objective</b><br>New proposed objective referencing appropriate access for emergency services in accordance with the Designers Guide to Firefighting Operations Emergency Vehicle Access F5-02 GD.                                                                                                                         | <u>All development and new buildings are to be in accordance with the Designers Guide to Firefighting Operations: Emergency Vehicle Access F5-02 GD.</u>                                                                                                                        | 4.2 |
| <b>Policies</b>                                |                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                 |     |
| IXXX.3 (17)                                    | <b>Support in part</b><br>Fire and Emergency is supportive of ensuring subdivision and development within the precinct is coordinated with water supply. It is essential, however, that the Precincts' policies and associated rules are drafted to deliver sufficient infrastructure which includes firefighting water supply.   | Amend as follows:<br>Avoid subdivision and development in advance of the provision of functioning bulk water supply, <u>firefighting water supply</u> , and bulk wastewater infrastructure with sufficient capacity to service subdivision and development within the Precinct. | 4.3 |
| IXXX.3 (24)                                    | <b>New policy</b><br>New proposed policy referencing appropriate access for emergency services in accordance with the Designers Guide to Firefighting Operations Emergency Vehicle Access F5-02 GD.                                                                                                                               | <u>Avoid subdivision and development of new buildings that are not in accordance with the Designers Guide to Firefighting Operations: Emergency Vehicle Access F5-02 GD.</u>                                                                                                    | 4.4 |
| <b>Rules</b>                                   |                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                 |     |
| Table IXXX.4.1 All zones Development Rule (A5) | <b>Support in part</b>                                                                                                                                                                                                                                                                                                            | Amend as follows:                                                                                                                                                                                                                                                               |     |

| Provision                                                      | Submission                                                                                                                                                                                                                                                                                                                                                                    | Relief sought                                                                                                                                                                                                                                                                                                                                                                                                                  |     |
|----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|                                                                | This rule is only relevant to Developments for bulk water supply. Therefore, it is crucial to ensure the requirement for firefighting water supply is referenced in the development rule for all zones.                                                                                                                                                                       | Development that does not comply with Standard IXXX.6.2.2 High Contaminant Yielding Materials and IXXX6.2.5 Stormwater, 1XXX.6.2.6 Bulk Water Supply, <a href="#">Firefighting Water Supply</a> and Wastewater Infrastructure and IXXX6.2.7 Vehicle Access Restriction                                                                                                                                                         | 4.5 |
| Table IXXX.4.1 Road and Access (A6) Development                | Access for emergency services is crucial for fast response. The table is missing rules in relation to emergency access, and Fire and Emergency seeks a new rule be implemented for Developments.                                                                                                                                                                              | <a href="#">All roads and vehicle access within Subdivisions to be in accordance with Designers Guide to Firefighting Operations: Emergency Vehicle Access F5-02 GD.</a>                                                                                                                                                                                                                                                       | 4.6 |
| Table IXXX.4.1 Road and Access (A8) Subdivision                | Access for emergency services is crucial for fast response. The table is missing rules in relation to emergency access, and Fire and Emergency seeks a new rule be implemented for Subdivisions.                                                                                                                                                                              | <a href="#">All roads and vehicle access within developments to be in accordance with Designers Guide to Firefighting Operations: Emergency Vehicle Access F5-02 GD.</a>                                                                                                                                                                                                                                                       | 4.7 |
| <b>Standards</b>                                               |                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                |     |
| IXXX 6.2.6 (1) Bulk Water Supply and Wastewater Infrastructure | <b>Support in part</b><br>Fire and Emergency opposes the standard as written, as it does not require future development or subdivision to demonstrate a compliant firefighting water supply in accordance with the Code of Practice prior to construction of any buildings or creation of any lots. Fire and Emergency would support this standard with the amendment sought. | Amend as follows:<br>(1) Bulk water supply, <a href="#">firefighting water supply</a> , and wastewater infrastructure with sufficient capacity for servicing the proposed development or subdivision must be completed, commissioned and functioning prior to construction of any buildings or creation of any lots. <a href="#">Firefighting water supply, and access to that supply, must comply with SNZ PAS 4509:2008.</a> | 4.8 |
| IXXX.6.2.8.10 Road and Access                                  | <b>Oppose</b><br>Fire and Emergency access is crucial in the development of new buildings or subdivision.<br>There is an error in the Standards of the Subdivision rules as Standard IXXX6.2.8.10 Road and Access appears to be missing from Appendix C: Precinct provisions document.                                                                                        | Amend as follows:<br><a href="#">IXXX.6.2.8.10 Road and Access</a><br>(X) <a href="#">All roads and vehicle access to be in accordance with Designers Guide to Firefighting Operations: Emergency Vehicle Access F5-02 GD.</a>                                                                                                                                                                                                 | 4.9 |

| Provision | Submission                                                                                                                                            | Relief sought |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|           | As per relief sought above, compliance with F5-02 GD is required to ensure that all new development can be adequately accessed by Fire and Emergency. |               |

**From:** [UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 119 - suju wang  
**Date:** Friday, 19 September 2025 9:30:26 am

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: suju wang

Organisation name:

Agent's full name:

Email address: zzwnz@hotmail.com

Contact phone number: 027--4205858

Postal address:  
 pobox 301316 albanv 0752  
 albanv  
 auckland 0752

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 119

Plan change name: PC 119 (Private) - Ara Hills (Hall Farm)

##### **My submission relates to**

Rule or rules:

I agree that my property will be rezoned in auckland unitary plan

Property address: 118 upper orewa rd silverdale

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 in my point of view ,for the reason of developing economy in our area should be based on local residents living and transportation conveniently, so I agree with the changes.

I or we seek the following decision by council: Approve the plan change without any amendments | 5.1

Details of amendments:

Submission date: 19 September 2025

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



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19 September 2025

Planning and Resource Consents  
Auckland Council  
Private Bag 92300  
Auckland 1142

Attn: Planning Technician

Email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

### **Proposed Private Plan Change 119 - Ara Hills**

Please find attached Auckland Transport's submission on Proposed Private Plan Change 119 - Ara Hills. The applicant is AV Jennings Hobsonville Pty Limited.

If you have any queries in relation to this submission, please contact me at [spatialplanning@at.govt.nz](mailto:spatialplanning@at.govt.nz) or on 09 930 5001 ext. 2427.

Yours sincerely



Katherine Dorofaeff  
**Principal Planner, Spatial Planning and Policy Advice**

cc:  
Ila Daniels, Campbell Brown Planning Limited  
by email: [ila@campbellbrown.co.nz](mailto:ila@campbellbrown.co.nz)

## Submission by Auckland Transport on Private Plan Change 119: Ara Hills

**To:** Auckland Council  
Private Bag 92300  
Auckland 1142

**Submission on:** Proposed Private Plan Change 119 from AV Jennings  
Hobsonville Pty Limited for land adjacent to the Grand Drive  
interchange and Orewa off-ramp (SH1), Wainui

**From:** Auckland Transport  
Private Bag 92250  
Auckland 1142

### 1. Introduction

- 1.1 AV Jennings Hobsonville Pty Limited (**the Applicant**) is applying for a private plan change (**PC119** or **the plan change**) to the Auckland Unitary Plan - Operative in Part (**AUP(OP)**) to rezone 84 ha of land in Wainui from Future Urban to Residential - Terrace Housing and Apartment Buildings Zone, Residential - Mixed Housing Urban Zone, Open Space - Informal Recreation Zone, Open Space - Conservation Zone and Business - Neighbourhood Centre Zone. PC 119 also applies precinct provisions and a Stormwater Management Area Control - Flow 1 control, and amends an area of native vegetation currently mapped as a Significant Ecological Area - Terrestrial.
- 1.2 Auckland Transport (**AT**) is a Council-Controlled Organisation of Auckland Council (**the Council**) and the Road Controlling Authority for the Auckland region. AT has the legislated purpose to contribute to an 'effective, efficient and safe Auckland land transport system in the public interest'.<sup>1</sup> In fulfilling this role, AT is responsible for the following:
- (a) The planning and funding of most public transport, including bus, train and ferry services.
  - (b) Promoting alternative modes of transport (i.e. alternatives to the private motor vehicle).
  - (c) Operating the roading network.
  - (d) Developing and enhancing the local road, public transport, walking and cycling networks.
- 1.3 Urban development generates transport effects and the need for robust implementation and investment plans for transport infrastructure and services to support construction, land use activities and the communities that will live and work in these areas. AT's submission seeks to ensure that the transport-related matters raised by PC119 are appropriately considered and addressed. In this case, the Applicant has resource consent for 575 lots with stages 1 to 3A of the development completed and some dwellings occupied. The current proposal is more intensive,

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<sup>1</sup> Local Government (Auckland Council) Act 2009, section 39.

and is assumed to provide for 950 dwellings and 710m<sup>2</sup> of local shops / convenience / amenity stores. The precinct provisions provide for additional retail if there is demand.

- 1.4 AT is part of the Te Tupu Ngātahi Supporting Growth Alliance (**Te Tupu Ngātahi**) which is a collaboration between AT and New Zealand Transport Agency Waka Kotahi (**NZTA**) to plan and route protect where appropriate the preferred transport network in future growth areas such as North Auckland and Warkworth, including Wainui and Ōrewa. On behalf of AT, Te Tupu Ngātahi lodged Notices of Requirement (**NOR**) to route protect for local arterial projects planned to service future growth in North Auckland. Particularly relevant to this plan change is NOR6 for a new connection between Milldale and Grand Drive, which connects Milldale and upper Ōrewa. NOR6 is for construction of a new urban arterial corridor with walking and cycling facilities, intersection upgrades and tie-ins to existing roads. The NOR connects directly to the plan change area. NOR 6 is currently at appeal stage, with one appeal. A portion of the proposed arterial corridor extending through the plan change area has not been included in the NOR as it has route protected via agreements with the Applicant. In addition, some of the road (Grand Drive West) has been constructed by the Applicant.
- 1.5 Also relevant to the plan change is the NZTA State Highway 1 Improvements - Albany to Ōrewa NOR (also lodged by Te Tupu Ngātahi). This project includes a new cycleway and/or shared path between Albany and Ōrewa, and a new Wainui Interchange active mode connection. The NOR is currently under appeal, and AT understands there is currently no funding for this project. NZTA anticipates that it will be delivered within the next 30 years.
- 1.6 AT is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

## 2. Strategic context

### Auckland Plan 2050 and FDS

- 2.1 The Auckland Plan 2050 (**Auckland Plan**) is a 30-year plan outlining the long-term strategy for Auckland's growth and development, including social, economic, environmental and cultural goals<sup>2</sup>. The transport outcomes identified in the Auckland Plan include providing better connections, increasing travel choices and maximising safety. To achieve these outcomes, focus areas outlined in the Auckland Plan include targeting new transport investment to the most significant challenges; making walking, cycling and public transport preferred choices for many more Aucklanders; and better integrating land use and transport. The high-level direction contained in the Auckland Plan informs the strategic transport priorities to support growth and manage the effects associated with this plan change.
- 2.2 The Auckland Plan 2050 and the Future Development Strategy 2023 (**FDS**) work together to set the high-level direction for Auckland over the long-term. In the FDS, the plan change area is part of the Upper Ōrewa Future Urban Area but is specifically identified as 'resource consent area'. The FDS identifies the timing for remainder of the Upper Ōrewa Future Urban Area as being 2050+. The proposed

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<sup>2</sup> The Auckland Plan is a statutory spatial plan required under section 79 of the Local Government (Auckland Council) Act 2009. It was adopted in June 2018, and updated in September 2022.

timeframe indicates when the infrastructure required to service the full build-out of the area is likely to be implemented.

### **NPS-UD and AUP-RPS**

- 2.3 PC119 proposes to rezone Future Urban land to urban zonings. However this is not a new 'greenfields' proposal, given the previous resource consent and development that has occurred to date. The plan change does however seek to enable additional development not covered by the existing consent. In addition there are some changes to the roading layout.
- 2.4 The key overarching considerations and concerns for AT relate to the NPS-UD and AUP-RPS objectives and policies relating to transport matters. Four key themes relevant to assessing this plan change are:
  - (a) Integrating development with infrastructure provision including effective, efficient and safe transport. Integration includes ensuring transport infrastructure is planned, funded and staged to integrate with urban growth. (NPS-UD Objective 6(a); AUP-RPS B2.2.1(1)(c) and (5)(a); B2.2.2(7)(c); B2.3.1(1)(d); B2.4.2(6); B3.3.1(1)(a) to (c); B3.3.2(4)(a) and (5)(a)).
  - (b) Reducing dependence on private vehicle trips by encouraging land use development and patterns that support other modes and reduce the need to travel, and by providing for and enabling walking, cycling and public transport. (NPS-UD Objective 3(b) and (8)(a); Policy 1(c) and (e); AUP-RPS B2.2.1(1)(d); B2.2.2(caa); B2.3.2(1)(c) and (d), and (2)(b); B2.4.1(3); B2.4.2(2), (3) and (4)(a); B3.3.1(1)(e); B3.3.2(4)(b) and (5)(b)).
  - (c) Providing for the future development and upgrading of Auckland's transport infrastructure. (NPS-UD Objective 6(b); AUP-RPS B3.3.2(1) and (3)).
  - (d) Enabling infrastructure, including by protecting it from reverse sensitivity effects, while managing adverse effects on the health and safety of communities and amenity values. In the context of this plan change the reverse sensitivity and health and safety effects relate to road traffic noise from the future arterial road. (AUP-RPS B3.2.1(3)(b) and (6); B3.2.2(4) and (5); B3.3.1(1)(d); B3.3.2(5)(f), (6) and (7)).

### **3. Specific parts of the plan change that this submission relates to**

- 3.1 The specific parts of the plan change that this submission relates to are set out in **Attachment 1**. In keeping with AT's purpose, the matters raised relate to transport and transport assets, including integration between transport and land use.
- 3.2 AT **opposes** the plan change unless the matters raised in **Attachment 1** are satisfactorily addressed by the applicant.
- 3.3 AT is available and willing to work through the matters raised in this submission with the applicant.

### **4. Decisions sought**

- 4.1 The decisions which AT seeks from the Council are set out in **Attachment 1**, for the reasons stated in **Attachment 1** and above.

- 4.2 In all cases where amendments to the plan change are proposed, AT would consider alternative wording or amendments to like effect, which address the reason(s) for AT's submission. AT also seeks any consequential amendments required to give effect to the amendments and decisions requested.

**5. Appearance at the hearing**

- 5.1 AT wishes to be heard in support of this submission.
- 5.2 If others make a similar submission, AT will consider presenting a joint case with them at the hearing.

**Name:** Auckland Transport

**Signature:**



Patrick Buckley  
Manager - Spatial Planning Policy Advice

**Date:** 19 September 2025

**Contact person:** Katherine Dorofaeff  
Principal Planner: Spatial Planning and Policy Advice

**Address for service:** Auckland Transport  
Private Bag 92250  
Auckland 1142

**Telephone:** 09 930 5001 ext. 2427

**Email:** [spatialplanning@at.govt.nz](mailto:spatialplanning@at.govt.nz)

## Attachment 1

| Issue / Provision | Support / oppose | Reasons for submission                                                                                                                                                                                                                                     | Decision requested                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Overall           | Oppose           | Additional information and amendments to the plan change and precinct provisions are required to address the concerns raised in this submission.                                                                                                           | Decline the plan change unless the matters set out in this submission, as outlined in the main body of this submission and in this table, are addressed and resolved to AT's satisfaction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| ITA               | Oppose in part   | Some of the information in the ITA is not up-to-date, and there are some gaps in the information provided, including the need for additional traffic modelling to be provided to assess the transport effects of the proposal and the mitigation required. | <p>Request that the Applicant provide the following updated traffic data and modelling, and associated information (references are to the ITA):</p> <ul style="list-style-type: none"> <li>• Updated traffic count data. This may require traffic surveys if there is no publicly available data which is more up-to-date than the 2019 to 2021 data (Table 1)</li> <li>• Updated SIDRA traffic modelling using the new traffic count data. SIDRA intersection version 9 should be used.</li> <li>• Updated crash history data covering the most recent five-years of data available.</li> <li>• Update the base model to account for the correct layout of the western roundabout at the SH1 / Grand Drive interchange (Figure 13 is not correct)</li> <li>• Re-run the SIDRA model with 85% (rather than 65%) of the AM peak external trips from the plan change area heading south via the motorway onramp. The 65% referred to in Section 4.3 is based on 2028 Census data from Ōrewa, and may not reflect employment locations for Ara Hills residents.</li> <li>• Provide queue data for calibration purposes and to support the accuracy of the SIDRA model. This can be limited to the eastern roundabout at the motorway interchange in the AM peak.</li> <li>• Confirm that the SIDRA models are for a 950 dwelling development (Figures A5 to A8 in Appendix A all have '750 units' in their titles).</li> <li>• Explain why the traffic volumes shown in Figure 12 do not match the traffic volumes in Figures A5 to A8 in Appendix A.</li> </ul> |

6.1

6.2

| Issue / Provision | Support / oppose | Reasons for submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Decision requested                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   |                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>Provide daily traffic volumes for Grand Drive and other roads internal to the site.</li> </ul> <p>Amend the plan change and precinct provisions as required to respond to the additional information provided.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| ITA               | Oppose in part   | <p>There are some key differences between the road layout shown in previous consents and that now indicated on the precinct plans. It would be helpful to clarify how current development fits it with the new proposal.</p> <p>Precinct Plan 2 has an annotation identifying 'Access to future development lots from paper road'. AT supports the provision of roading links between the precinct and adjacent land. However further information is required to show that a road can be formed within the legal alignment to a suitable gradient.</p> <p>It is important that provision is made for future road and pedestrian connections between the precinct and adjoining land. Due to steep topography, and other constraints (such as streams) careful thought needs to be given to the location of such connections and the feasibility of extending them into adjacent Future Urban zoned sites in the future.</p> <p>It is apparent from the Precinct Development Plan (included in the Applicant's Neighbourhood Design Statement), that servicing the land in the south-western corner of the precinct (north of AT's NOR 6 / Grand Drive West) is dependent on a connection to the future arterial road. This relies on construction of the road by others through the land to the south. It will also require approval from AT for works within an NOR.</p> <p>AT has concerns about network resilience in accessing the proposed 900 dwelling development if Grand Drive West was compromised by an unexpected event such as a natural disaster, major crash, or the need to close a lane for maintenance purposes. A wide sealed shoulder could be appropriate mitigation to assist with traffic flows during an incident.</p> | <p>Request that the Applicant provide additional information related to the ITA to:</p> <ul style="list-style-type: none"> <li>Clarify what development has been constructed to date, and demonstrate that the roading layout is consistent with the Precinct Plan 1.</li> <li>Confirm whether it is practicable to construct a formed road within the alignment annotated on Precinct Plan 1 (along the western boundary) as 'Access to future development lots from paper road'</li> <li>Assess whether a local road or active mode connection can be provided from the precinct land on the southern side of Grand Drive West to the adjacent land adjoining the southern boundary of the precinct</li> <li>Clarify how it is intended to service the land in the south-western corner of the precinct, on the northern side of the future Grand Drive West alignment.</li> <li>Assess the resilience of Grand Drive West in providing access into a 900 dwelling development with only one road in and out.</li> </ul> <p>Amend the plan change and precinct provisions as required to respond to the additional information provided.</p> |

6.3

6.4

6.5

| Issue / Provision   | Support / oppose | Reasons for submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Decision requested                                                                                                                                                                                                                                                                                                                                                     |     |
|---------------------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 950 dwellings       | Oppose in part   | The ITA has assessed effects based on a full-build out of 950 dwellings for the precinct. The precinct provisions should limit development to this amount, with an additional transport assessment required for any proposals which would result in additional dwellings in excess of 950. This should include modelling to assess the effects on the motorway interchange and queuing on Grand Drive to the east of the interchange.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Amend the precinct provisions to limit development to 950 dwellings with additional assessments, including a transport assessment, required for proposals which would result in more than 950 dwellings or residential units within the precinct.                                                                                                                      | 6.6 |
| Acoustic mitigation | Oppose           | The proposal will enable activities sensitive to noise, such as residential development, adjacent to a proposed arterial road (Grand Drive West). Literature relating to the health effects and amenity effects of noise indicate that there is evidence of a causal relationship between environmental noise and sleep disturbance and cardiovascular disease, and a link between environmental noise and effects on amenity more generally (e.g. annoyance effects). Development for activities sensitive to noise should be designed to protect people's health and residential amenity while they are indoors. This is not currently adequately addressed by existing AUP(OP) provisions, but has been addressed in a number of recent operative plan changes (e.g. PC49 Drury East, PC50 Waihoehoe, PC61 Waipupuke, PC76 Pukekohe East-Central, PC93 Warkworth South). Relevant provisions should be included in this precinct, if PC119 is approved. Such provisions will give effect to higher order provisions in the AUP(OP) (e.g. Policy B3.3.2(6)). | Amend the plan change to include precinct provisions (an objective, policy, standards, matters of discretion, and assessment criteria) to require that future developments and alterations to existing buildings mitigate potential road traffic noise effects on activities sensitive to noise from the proposed arterial being Grand Drive West (including AT NOR6). | 6.7 |
| Zoning              | Oppose in part   | <p>All of the plan change area south of Grand Drive West is proposed to be zoned either Residential - Terrace Housing and Apartment Buildings (<b>THAB</b>) or Business - Neighbourhood Centre. This includes applying a THAB zoning to the land located between the western and southern boundaries and the adjacent streams and indicative open space areas. Objective H6.2(1) sets the following outcome for THAB:</p> <p style="padding-left: 40px;">'Land adjacent to centres and near the public transport network is efficiently used to provide high-density urban living that increases housing capacity and choice and access to centres and public transport.'</p> <p>The THAB zoning is not supported for this land due to access limitations. It is separate from the rest of the proposed</p>                                                                                                                                                                                                                                                    | Remove the proposed THAB zoning from the land south of Grand Drive West which is located between the stream and indicative open space areas and the western and southern boundaries of the plan change area. Apply a lower intensity zoning appropriate to accessibility of the land and consistent with Objective H6.2(1).                                            | 6.8 |

| Issue / Provision                 | Support / oppose | Reasons for submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Decision requested                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |      |
|-----------------------------------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
|                                   |                  | development and there is no information about how it would be provided with access to the centre and to public transport.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |      |
| Road function and design elements | Oppose in part   | Some roads within the precinct have already been constructed and others, though not constructed, have been assessed as part of resource consent processes. However a plan change enabling a more intensive residential development than previously consented is now proposed. AT's approach to precincts which provide for substantial new developments (particularly in greenfield areas) is to seek precinct provisions which include Road Function and Design Elements tables setting out the parameter for the design of roads within a precinct. Such tables and associated precinct provisions have been included in up to 15 recent precincts introduced by now operative plan changes (e.g. PC48 Drury Centre, PC49 Drury East, PC50 Waihoehoe, PC61 Waipupuke, PC76 Pukekohe East-Central, PC86 Whenuapai 3, PC93 Warkworth South). | <p>Amend the plan change by including precinct provisions (policy, standards, matters of discretion, and assessment criteria) relating to road design. Include a road design standard requiring development or subdivision that includes the construction of new roads, or the upgrade of existing roads, to comply with a Road Function and Design Elements table.</p> <p>Include a Road Function and Design Elements table which sets out the minimum requirements for roads within the precinct including role and function of each road, road reserve width, speed limit (design), and the elements it needs to contain (e.g. cycle and pedestrian facilities, provision for buses).</p> <p>Provide for non-compliance with the road design standard and associated table as a restricted discretionary activity with appropriate assessment matters.</p> | 6.9  |
| IXXX.2 Objective 1                | Support in part  | Objective 1 is supported as it requires subdivision and development to be integrated with the provision of transport infrastructure, in accordance with Precinct Plan 1. A minor amendment is required to refer to Grand Drive West as a 'future arterial' rather than as a 'strategic road corridor'. This is to achieve consistency with terminology used elsewhere in the precinct.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>Amend Objective 1 as follows:</p> <p>'(1) Subdivision and development are in accordance with Precinct Plan 1, and are staged, designed, and delivered to align with the provision and upgrading of open space and transport infrastructure (<del>strategic future arterial road corridor, and other</del> road connections and pedestrian and cycling linkages).'</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 6.10 |
| IXXX.2 Objective 5                | Support          | Objective 5 is supported as the outcome sought is a well-connected, safe and efficient road network, including connections to the wider roading and pedestrian network and to adjacent land.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Retain Objective 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 6.11 |
| IXXX.2 Objective 6                | Support          | Objective 6 is supported as the outcome sought is pedestrian and cycle linkages within the precinct, including connections to the wider roading and pedestrian network and to adjacent land.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Retain Objective 6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 6.12 |
| IXXX.2 Objective 10               | Support          | Objective 10 is supported as it recognises that the design of the neighbourhood centre needs to take into account the future                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Retain Objective 10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 6.13 |

| Issue / Provision                      | Support / oppose | Reasons for submission                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Decision requested                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |      |
|----------------------------------------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
|                                        |                  | arterial i.e. Grand Drive West. Objective 10 also aligns with Policy 4 which (with amendments as recommended elsewhere in this submission) references the requirement for the neighbourhood centre to avoid vehicle access from Grand Drive West.                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |      |
| IXXX.3 Policy 1                        | Support          | Policy 1 is supported as it requires subdivision and development to be in general accordance with Precinct Plan 1. Precinct Plan 1 shows the indicative location of key elements of the transport network proposed to service the precinct and provide connections to adjacent land.                                                                                                                                                                                             | Retain Policy 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 6.14 |
| IXXX.3 Policy 4                        | Support in part  | An amendment is required to Policy 4 reflect the non-complying activity status applying to vehicle access from Grand Drive West. The precinct provisions require that there be no vehicle access from that future arterial - this a stronger requirement than simply restricting vehicle access which implies that some limited vehicle access may be provided for.                                                                                                              | Amend Policy 4 as follows:<br><br>'(4) The design and built form of the neighbourhood centre must take account of the future arterial road corridor and <del>incorporate restricted vehicle access including by avoiding vehicle access from that road</del> as shown on Precinct Plan 1.'                                                                                                                                                                                                                                                   | 6.15 |
| IXXX.3 Policy 8                        | Support in part  | Policy 8 is supported with amendments. The reference to the 'indicative road layout' can be more simply stated as 'roads'. The sentence about amendments requiring consultation with and the agreement of Waka Kotahi NZTA and AT is too specific for inclusion in a policy. Input from these road controlling authorities would occur where relevant as part of a resource consent application which involved non-compliance with Precinct Plan 1 (see Standard IXXX.6.3.8(2)). | Amend Policy 8 as follows:<br><br>'(8) Locate, construct and vest the <del>indicative roads layout</del> and other transport upgrades, including pedestrian linkages and cycleways and safeguard the future arterial road corridor, in general accordance with Precinct Plan 1 and the relevant staging provisions. <del>Any required amendments to the existing road network, including pedestrian and cycleways must be designed and undertaken in consultation and with the agreement of Waka Kotahi – NZTA and Auckland Transport.</del> | 6.16 |
| Table IXXX.4.1 All zones (A2) and (A5) | Support          | The non-complying activity status applying to use and development which does not comply with Standard IXXX6.2.7 Vehicle Access Restriction is supported. It is consistent with recognising and protecting the future arterial road status applying to Grand Drive West.                                                                                                                                                                                                          | Retain the non-complying activity status applying to use and development that does not comply with Standard IXXX6.2.7 Vehicle Access Restriction.                                                                                                                                                                                                                                                                                                                                                                                            | 6.17 |
| Table IXXX.4.1 All zones (A8)          | Support in part  | The discretionary status applying to subdivision that does not meet the roading and access standard is supported. It is consistent with the need for the transport infrastructure to be provided to support subdivision. Minor rewording is sought so that it is clear that the discretionary status is triggered by non-                                                                                                                                                        | Reword (A8) as follows, and retain the discretionary activity status for not meeting the standard:                                                                                                                                                                                                                                                                                                                                                                                                                                           | 6.18 |

| Issue / Provision                                 | Support / oppose | Reasons for submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Decision requested                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |      |
|---------------------------------------------------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
|                                                   |                  | compliance. In addition the relevant standard has been incorrectly cross-referenced.                                                                                                                                                                                                                                                                                                                                                                                                                      | 'Subdivision that <del>is not in accordance</del> does not comply with Standard IXXX.6.2.8.6 ... and IXXX.6.2.3.8-10 <u>Roading and Access.</u> '<br><br>Note: Other submission points request that Standard IXXX.6.3.8 be amended to apply to development as well as subdivision and that the name be amended accordingly.                                                                                                                                                                                                                                            |      |
| Table IXXX.4.1 All zones new entry                | Oppose           | (A8), which applies to subdivision, needs to be matched by a similar entry applying to development which does not meet the roading and access standard. This is consistent with the need for transport infrastructure to support development as well as subdivision. Substantial development, such as retirement villages and other integrated residential development, can occur without subdivision.                                                                                                    | Insert a new entry in Table IXXX.4.1 All zones applying discretionary activity status to the following:<br><br>' <u>Development that does not comply with Standard IXXX.6.3.8 Roothing and Access.</u> '<br><br>Note: Other submission points request that Standard IXXX.6.3.8 be amended to apply to development as well as subdivision and that the name be amended accordingly.                                                                                                                                                                                     | 6.19 |
| IXXX.6.2.7 Vehicle Access Restriction             | Support in part  | It is appropriate to avoid vehicle access onto Grand Drive West however redrafting of the standard is required to better define its purpose, and to clarify its application. Cross-referencing E27.6.4.1(3) lacks clarity. That standard applies to arterial roads identified as such on the AUP planning maps - this does not apply to Grand Drive West. That standard also applies a restricted discretionary activity status to non-compliance - the proposed precinct applies a non-complying status. | Amend Standard IXXX.6.2.7 Vehicle Access Restriction, as follows:<br><br>'Purpose: To safeguard the future arterial status of Grand Drive, <u>provide for the safe and efficient operation of the arterial road network and enhance ensure vehicle and pedestrian safety for active modes.</u><br><br>(1) <del>Standard E27.6.4.1(3) applies to all the site boundaries along the frontage of Grand Drive. No vehicle crossings or vehicle access are allowed off-is permitted from Grand Drive (shown as Indicative Future Arterial Road on Precinct Plan 1).</del> ' | 6.20 |
| IXXX.6.3.1 Subdivision standards for the precinct | Oppose in part   | There is some overlap between Standard IXXX.6.3.1 Subdivision standards for the precinct, and Standard IXXX.6.3.8 Subdivision standards for roading and access, as it relates to transport matters. The relationship between the standards needs to be clarified and duplication removed.                                                                                                                                                                                                                 | Clarify why Standard IXXX.6.3.1(1) duplicates transport matters (provision of vehicle, pedestrian connections, and roading) covered in Standard IXXX.6.3.8 Subdivision standards for roading access.<br><br>Amend Standard IXXX.6.3.1(1) to remove any unnecessary duplication.                                                                                                                                                                                                                                                                                        | 6.21 |

| Issue / Provision                                                                       | Support / oppose | Reasons for submission                                                                                                                                                                                                                                                                                                                                                                                                                            | Decision requested                                                                                                                                                                                                                                                                                                 |      |
|-----------------------------------------------------------------------------------------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| IXXX.6.3.4 Subdivision standards for riparian margins                                   | Support          | The exclusion in Standard IXXX.6.3.4(1) for road crossings over streams is supported as it recognises that roads can have a functional and operational need to cross over a stream and where this occurs it will not be practicable to comply with riparian margin planting requirements.                                                                                                                                                         | Retain the following wording in Standard IXXX.6.3.4(1):<br>'... This standard does not apply to road crossings over streams.'                                                                                                                                                                                      | 6.22 |
| IXXX.6.3.8 Subdivision standards for roading and access                                 | Oppose in part   | This amendment is consistent with the need for transport infrastructure to support development as well as subdivision. Substantial development, such as retirement villages and other integrated residential development, can occur without subdivision. In addition, Standard IXXX.6.3.8(5) is already drafted as applicable to development rather than subdivision as the shared use path is required prior to the completion of 300 dwellings. | Amend the standard to apply to development as well as subdivision. This includes relocating the standard to the Precinct Standards under IXXX.6.2.                                                                                                                                                                 | 6.23 |
| IXXX.6.3.8 Subdivision standards for roading and access<br>Naming and purpose statement | Oppose in part   | The amendments to the title and the purpose statement are needed as the standard should apply to both subdivision and development.                                                                                                                                                                                                                                                                                                                | Amend the title and purpose statement of Standard IXXX.6.3.8 as follows:<br><br><b>'IXXX.6.3.8 Subdivision Standards for roading and access'</b><br><br>'Purpose – To ensure <u>subdivision and development</u> within the precinct is supported by a safe, efficient and legible movement and transport network.' | 6.24 |
| IXXX.6.3.8 Subdivision standards for roading and access                                 | Oppose in part   | The proposed Neighbourhood Centre zone is proposed to be located on both sides of Grand Drive West. This is likely to generate demand for pedestrians and cyclists to cross between the two parts of the commercial area.                                                                                                                                                                                                                         | Amend Standard IXXX.6.3.8 to include a requirement for safe crossing facilities to be provided over Grand Drive West between the two parts of the proposed Neighbourhood Centre.                                                                                                                                   | 6.25 |
| IXXX.6.3.8 Subdivision standards for roading and access (2)                             | Oppose in part   | Standard IXXX.6.3.8(2) needs to be clarified as it refers to pedestrian accessways in relation to Precinct Plan 1, when no such accessways are marked on the precinct plan. The intention may be to refer to 'indicative pedestrian shared path' shown on Precinct Plan 1. Alternatively the intention may be to refer to the 'indicative green pedestrian corridor' shown on Precinct Plan 2.                                                    | Amend Standard IXXX.6.3.8(2) to clarify the reference to 'pedestrian accessways'. There are no pedestrian accessways shown on Precinct Plan 1.                                                                                                                                                                     | 6.26 |
| IXXX.6.3.8 Subdivision standards for roading and access (3)                             | Oppose           | AT's approach to precincts which provide for substantial new developments (particularly in greenfield areas) is to seek precinct provisions which include Road Function and Design Elements tables setting out the parameter for the design of                                                                                                                                                                                                    | Delete Standard IXXX.6.3.8(3) and replace it with a requirement for any development or subdivision that includes the construction of new roads, or the upgrade of existing                                                                                                                                         | 6.27 |

| Issue / Provision                                           | Support / oppose | Reasons for submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Decision requested                                                                                                                                                                                                                                                                                                                                                                                                 |      |
|-------------------------------------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
|                                                             |                  | <p>roads within a precinct. Such tables and associated precinct provisions have been included in up to 15 recent precincts introduced by now operative plan changes (e.g. PC48 Drury Centre, PC49 Drury East, PC50 Waihoehoe, PC61 Waipupuke, PC76 Pukekohe East-Central, PC86 Whenuapai 3, PC93 Warkworth South).</p> <p>Some roads within the precinct have already been constructed and others, though not constructed, have been assessed as part of resource consent processes. However a plan change enabling a more intensive residential development than previously consented is now proposed. It is appropriate to adopt a fit-for-purpose framework for new and upgraded roads going forward.</p> | roads, to comply with a newly inserted Road Function and Design Elements table.                                                                                                                                                                                                                                                                                                                                    |      |
| IXXX.6.3.8 Subdivision standards for roading and access (3) | Oppose           | Standard IXXX.6.3.8(3) includes a note stating that the precinct plan does not require the physical formation of the indicative future arterial or Grand Drive to the western boundary. This is not supported - construction of the road should continue to the boundary of the adjacent site.                                                                                                                                                                                                                                                                                                                                                                                                               | Amend Standard IXXX.6.3.8 to require Grand Drive West to be constructed to the western boundary of the plan change area.                                                                                                                                                                                                                                                                                           | 6.28 |
| IXXX.6.3.8 Subdivision standards for roading and access (4) | Oppose in part   | Standard IXXX.6.3.8(4) should be redrafted so it cross-references the vehicle access restriction in Standard IXXX.6.2.7.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Amend Standard IXXX.6.3.8(4) as follows:</p> <p><del>'Vehicle Crossings Access Restrictions</del></p> <p>(4) Subdivision must be designed in compliance with the Standard IXXX.6.2.7 Vehicle Access Restriction. <del>E27.6.4.1(3) applies to the site boundaries along the Indicative Future Arterial shown on Precinct Plan 1. No vehicle crossings are allowed off the Indicative Future Arterial.</del></p> | 6.29 |
| IXXX.6.3.8 Subdivision standards for roading and access (5) | Oppose in part   | Inconsistent terminology is used within the precinct when referring to the shared use path. Standard IXXX.6.3.8 refers to 'pedestrian accessways', 'pedestrian shared path', and 'shared cycle / footpath'. Precinct Plan 1 shows an 'indicative pedestrian shared path'.                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Amend Standard IXXX.6.3.8(5) (including the associated subheading) and / or Precinct Plan 1 to ensure that there is consistent terminology used within the precinct provisions when referring to the shared cycle / footpath.</p> <p>Note: This is subject to another submission point that seeks separated cycle facilities rather than a shared path.</p>                                                     | 6.30 |

| Issue / Provision                                               | Support / oppose | Reasons for submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Decision requested                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IXXX.6.3.8 Subdivision standards for roading and access (5)     | Oppose in part   | <p>While provision of a shared path may have been a condition of the previous resource consents, a plan change is now being applied for, intensity has increased, and it is appropriate to consider whether this is still a fit for purpose design. Current AT standards would require separate cycle and pedestrian facilities in the first instance. A shared path requires a departure from standards, with a further departure required for a width less than 4m. NZTA may have different requirements for the portion of the facility located within their road corridor.</p> <p>The standard refers to the requirement to connect to the existing shared cycle / footpath on the northern side of Grand Drive at the Grand Drive / Arran Drive intersection. The shared path is not located on the northern side of Grand Drive at this intersection - but rather on the south-eastern corner of the Grand Drive / Arran Drive intersection. Connecting into the existing shared path, from the northern side of the road will therefore require safe crossing facilities.</p> | Amend Standard IXXX.6.3.8(5) to replace the requirement for a shared path with requirements for separated cycle and pedestrian facilities which meet current AT standards to be provided adjacent to Grand Drive where AT is the relevant road controlling authority. Require safe crossing facilities be provided to connect the new facility with the existing shared path on the south-eastern corner of the Grand Drive / Arran Drive intersection.                                                                                                                                                    |
| IXXX.8.1 Matters of discretion and IXXX.8.2 Assessment criteria | Oppose           | Standard IXXX.8 does not include any assessment matters relating to transport for subdivision and development. For subdivision as a restricted discretionary activity, the assessment matters in E38 Subdivision - Urban would be relied on. The general assessment matters in E38 should be complemented by matters which more specifically relate to Precinct Plan 1 and other matters that need to be specifically considered for this precinct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>Amend Standard IXXX.8.1 and Standard IXXX.9 to include matters of discretion and associated assessment criteria for subdivision and development that address transport matters. The assessment matters should address:</p> <ul style="list-style-type: none"> <li>• Transport including the development of an integrated road network</li> <li>• Location and design of roads</li> <li>• Provision of cycling and pedestrian networks</li> <li>• Consistency with Precinct Plan 1</li> <li>• Connections to adjacent sites</li> <li>• Stormwater infrastructure and devices within the road.</li> </ul> |
| IXXX.9 Special information requirements                         | Oppose in part   | Standard IXXX.6.3.8(5) requires a shared use path (i.e. the indicative pedestrian shared path shown on Precinct Plan 1) to be provided prior to the completion of 300 dwellings within the precinct. It is appropriate to include a special information requirement requiring applicants to monitor dwelling numbers and demonstrate compliance with the standard.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>Amend IXXX.9 to include a new special information requirement as follows:</p> <p>'(x) Monitoring of compliance with Standard IXXX.6.3.8(5)</p> <p>Any proposal for construction of dwellings must demonstrate compliance with Standard IXXX.6.3.8(5) relating to completion of the shared use path. This includes providing information about the number of</p>                                                                                                                                                                                                                                         |

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6.33

| Issue / Provision | Support / oppose | Reasons for submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Decision requested                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   |                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | dwelling already completed and / or consent within the Precinct.                                                                                                                                                                                                                                                                                                                                                        |
| Precinct Plan 1   | Oppose in part   | Precinct Plan 1 identifies 'access to future development lots from paper road'. This annotation is not referred to elsewhere in the precinct provisions. It is not included on the version of the precinct plan included in the ITA (as Figure 8).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>Explain the purpose of showing on Precinct Plan 1 the 'access to future development lots from paper road'.</p> <p>Depending on whether or not the explanation shows the annotation to be of assistance to future users of the precinct provisions, the annotation should either be explained in precinct provisions, or deleted from the precinct plan.</p>                                                          |
| Precinct Plan 1   | Oppose in part   | Pedestrian connections are inconsistently labelled between Precinct Plan 1 and 2. The terminology is also inconsistent with that used in Standard IXXX.6.3.8.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Clarify whether the 'indicative recreation open space' annotated on Precinct Plan 1 is more correctly labelled as 'indicative green pedestrian corridor'. This would be consistent with Precinct Plan 2. Also make any amendments needed to ensure that terminology used in Precinct Plan 1 is consistent with that used in Standard IXXX.6.3.8, particularly in relation to pedestrian connections and infrastructure. |
| Precinct Plan 2   | Oppose in part   | <p>Standard IXXX.6.3.1(2) includes a requirement for revegetation and replanting to be in accordance with Precinct Plan 2 Revegetation and Open Space Concept. The specimen trees indicated on Precinct Plan 2 are mostly located within the future road reserves. AT supports planting of street trees. However Precinct Plan 2 provides too much detail about the potential number and location of such trees. The location of specimen trees within the road reserve is a matter better determined at later consenting stages. There are other elements competing with trees for space in road berms - e.g. vehicle crossings, parking bays, street lights, and stormwater treatment. In addition, only the key local roads and the future arterial road are shown on Precinct Plan 1, so it is misleading to include a fuller roading pattern on Precinct Plan 2.</p> <p>If the applicant wishes to show that street trees are intended within the road reserve, this could be addressed by including a column within the Road Function and Design Elements table recommended elsewhere in this submission.</p> | Amend Precinct Plan 2 to remove the 'Indicative specimen trees'.                                                                                                                                                                                                                                                                                                                                                        |

6.34

6.35

6.36

NZ Transport Agency Waka Kotahi Reference: 2025 -1151

19 September 2025

Auckland Council  
C/- Planning Technician  
135 Albert Street  
Auckland Central 1010

Via email: [unitaryplan@aucklandcouncil.co.nz](mailto:unitaryplan@aucklandcouncil.co.nz)

Dear to whom this may concern,

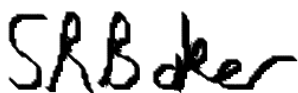
**Submission on Proposed Plan Change 119 – Ara Hills (Halls Farm), 229 Grand Drive, Ōrewa**

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on the proposed plan change to rezone 84 ha of land known as Ara Hills west of the Grand Drive / State Highway 1 interchange at Ōrewa from Future Urban Zone to Residential - Terraced Housing and Apartment Zone, Residential - Mixed Housing Urban Zone, Open Space - Informal Recreation Zone, Open Space - Conservation Zone, and Business - Neighbourhood Centre Zone, and also to introduce a new precinct overlay over the adjoining Nukumea Scenic Reserve.

We welcome the opportunity to discuss the contents of our submission with council and the applicant as required.

If you have any questions, please contact me.

Yours sincerely



Shaun Baker  
Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services  
Phone: 099 541 303  
Email: [environmental.planning@nzta.govt.nz](mailto:environmental.planning@nzta.govt.nz)

**FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991****Submission on Private Plan Change 119 – Ara Hills - AVJennings**

**To:** Auckland Council  
C/- Planning Technician  
135 Albert Street  
Auckland Central 1010

Via email: unitaryplan@aucklandcouncil.co.nz

**From:** NZ Transport Agency Waka Kotahi  
Auckland Office  
Private Bag 106602  
Auckland 1143

**1. This is a submission on the following:**

Proposed Plan Change 119 to change to rezone 84 ha of land known as Ara Hills west of the Grand Drive / State Highway 1 (SH1) interchange at Ōrewa from Future Urban Zone to Residential - Terraced Housing and Apartment Zone, Residential - Mixed Housing Urban Zone, Open Space - Informal Recreation Zone, Open Space - Conservation Zone, and Business - Neighbourhood Centre Zone.

The proposed plan change also includes:

- A new precinct overlay over the adjacent Nukumea Scenic Reserve, which will include provisions to recognise the ecological and amenity values of the Reserve, requiring all open space to be accessible to the public even though most of it will be owned and managed by the residents, and riparian planting along the streams;
- A flexible commercial sub-precinct to provide flexibility for additional ground floor commercial floor space adjacent to the neighbourhood centre;
- Mixed Density Residential Standards;
- Adding the area to the mapped Stormwater Management Control Area – Flow 1 overlay on the Auckland Unitary Plan Operative in part (AUP(OP)) Planning Maps; and
- Amending the area of native vegetation in the Special Ecological Area overlay on the AUP(OP) Planning Maps.

**2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.****3. Role of NZTA**

NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Roadings Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by NZTA. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

#### 4. State highway environment and context

- The existing environment is rural and located west of the Grand Drive / SH1 interchange.
- The subject site is accessed by Grand Drive, which is a local road. Stage 1 and 3A for the Ara Hills residential development are complete. Stage 2 is currently under construction. There is significant greenfield development south of the Ara Hills development in the Ōrewa, Milldale and Silverdale areas. The site adjoins the Nukumea Scenic Reserve to the northwest.

#### 5. The submission of NZTA is:

- 5.1 NZTA is neutral on the proposed plan change, does wish to raise some points for consideration, as outlined in this submission.

##### Stormwater:

- 5.2 NZTA's stormwater engineers raised concerns about the effects the proposed plan change will have on the flood resilience of the highway system. NZTA has two stormwater culvert systems (see Figure 1) that will be impacted by the proposed plan change. These culvert systems were initially built in the 1990s and 2000s as part of the ALPURT B1 and B2 projects. The culverts have limited performance capability, were designed for maximum probable discharge scenarios applicable under the Auckland Council Regional Plan: Air, Land and Water at the time, and are currently in a moderate condition. NZTA has concerns about the additional demand and risk that increased flows will present to the resilience of the highway during major stormwater events.

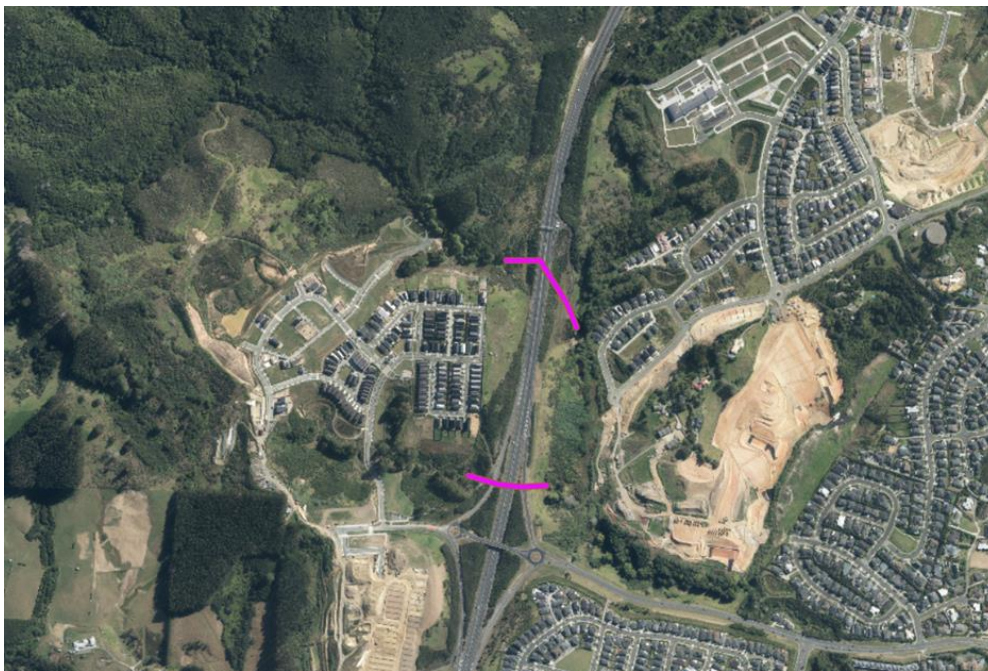


Figure 1: Location of stormwater culvert systems (in purple)

- 5.3 The applicant's Engineering Report suggests that no flood control is required due to limitations within NZTA's system. However, it is essential that the proposed development does not adversely impact on these

culvert systems or the resilience of the highway system embankment. The proposed plan change will result in a measurable increase to rates and volumes of runoff, and thereby presents a flood resilience risk to the state highway network as increased flood depths and velocities against the motorway embankment present a measurably greater risk of erosion, scour and risk for failure of the embankment and culvert systems.

- 5.4 The controls in place to manage erosion and sediment discharges from the first stage of the Ara Hills development have not been suitably effective. The management of slash has been poor and resulted in risk and damage to state highway assets. The scale of proposed development that would be enabled by the proposed plan change will inevitably result in the mobilisation of debris from the 'deforested' area during events, which presents risk of blockage at the NZTA culvert systems. It is essential that robust erosion and sediment control measures in accordance with Auckland Council Guideline Document 2016/005 *Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region* (GD05) are applied, should the proposed plan change be approved and development proceed.
- 5.5 NZTA has a consented<sup>1</sup> stormwater treatment pond situated about the inlet of the southern culvert, immediately north of Grand Drive. The reliance on limitations in the NZTA system (i.e. additional impoundment against the highway embankment) in lieu of specific flood control or mitigation measures presents risk of a washout or compromising the integrity of the stormwater treatment pond. The applicant has not provided evidence that the risk will not be increased as a result of the development enabled by the proposed plan change.
- 5.6 NZTA considers that the applicant needs to demonstrate that NZTA P46 stormwater standards will not be measurably compromised, and that the additional impoundment (flood levels) will not adversely impact on the resilience of the NZTA fill embankment, culvert systems, and stormwater pond. If the applicant is not required to provide flood mitigation measures. A high flow riser may need to be installed to the stormwater culverts south of the Grand Drive interchange to mitigate the increased risk to NZTA's assets and the resilience of the state highway.

7.1

#### Grand Drive Shared Path:

- 5.7 The resource consent for Stage 1, Stage 2 and Stage 3A of the Ara Hills development (BUN20441333), was granted by Auckland Council in August 2017. The applicant was conditioned to construct a shared path from the Ara Hills development across SH1 via the Grand Drive overbridge to the Arran Drive / Grand Drive intersection. The applicant was issued s176(1)(b) and s178(2) approval from NZTA to construct the shared path within NZTA's designations and notices of requirement in September 2024.

<sup>1</sup> Resource Consent Permit Number 24530

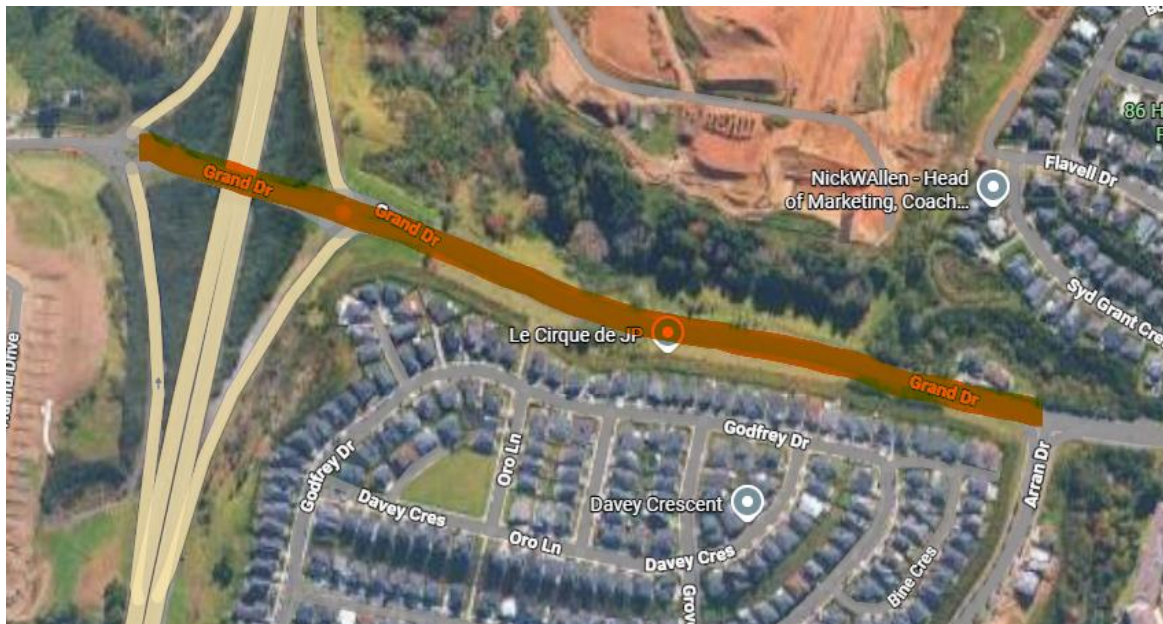


Figure 2: Google aerial view of Grand Dr with the proposed length of shared path (in orange)

5.8 However, according to aerial imagery and Google Street View, the shared path has not yet been constructed. There remains no active mode connections between Ara Hills and the wider transport network and a limited number of transport options for those who do not or cannot drive, due to the lack of active mode access to the public transport network. The nearest eastbound bus stop for the 985 bus route is located 180m east of Arran Drive, and the nearest westbound stop is located 400m east of Arran Drive. Without the shared path, safe and accessible walking and cycling access to these bus stops is limited.



Figure 3: Google Street View image of Grand Dr overbridge westbound dated April 2025

5.9 If the proposed plan change is approved, it will result in a significant increase in development at Ara Hills. NZTA recommends that the shared path be constructed as construction commences on future stages of Ara Hills.

7.2

## Traffic Effects on the SH1 / Grand Drive interchange

5.10 NZTA's transport engineers and transport planners have assessed the Integrated Traffic Assessment (ITA) prepared by Flow Transport Specialists on behalf of the applicant and submitted in support of the proposed plan change. They note that the traffic modelling and census data that was used in the ITA is out-of-date, relying on 2018 Census data and traffic volumes from 2018/2019, which also assumed no growth beyond the proposed development. As the area has experienced significant development since 2018, this likely underrepresents existing and future baseline traffic levels.



Figure 4: Aerial map taken 2017 and 2024/2025 with areas circled in red likely not accounted for in the traffic volumes taken in 2018/2019.

5.11 The SIDRA modelling work that informed the ITA—which concluded that traffic under the proposed plan change scenario would have only minor/negligible effects on the Grand Drive / SH1 roundabouts and the new Ara Hills / Grand Drive junction—utilised mid-2018 hourly traffic volumes. To adequately scrutinise potential and cumulative effects on the Level of Service (LOS) at the SH1 / Grand Drive interchange, NZTA recommends that the model is updated to reflect recent counts and demographic information, and that cumulative scenarios including other recently complete, approved, or planned developments are run to enable analysis of potential effects on the operational and network performance of both the interchange and the surrounding local network. 7.3

5.12 The proposal shows that, in the short to medium term, until a new arterial connection and additional connections progressed through Supporting Growth projects are realised, the proposed development will rely on a single motorway interchange access. This lack of alternative access creates potential resilience issues and a vulnerability in the network in the event that the interchange is subject to closure or heavy congestion. It would be helpful for the ITA to include an assessment of operations and resilience under incident scenarios, factoring in cumulative traffic from other recent and approved developments, as noted above. 7.4

## **6. NZTA seeks the following decision from the local authority:**

- (i) If the local authority is of a mind to approve the proposed plan change, NZTA seeks assurance that stormwater from the proposed development areas will be managed in a manner that avoids adverse effects on NZTA's assets and ability to discharge stormwater safely and reliably from the state highway.

- (ii) Any other relief that would provide for the adequate consideration of potential effects on the state highway network and its users, particularly in relation to those matters raised in previous sections of this submission.

7. **NZTA does wish to be heard in support of this submission.**
8. **If others make a similar submission, NZTA will not consider presenting a joint case with them at the hearing.**
9. **NZTA is willing to work with the applicant in advance of a hearing.**

Signature:



Stephanie Kane  
Principal Planner / Senior Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services  
Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: 19 September 2025

Address for service: NZ Transport Agency Waka Kotahi  
PO Box Private Bag 106602  
Auckland 1143

Contact Person: Shaun Baker  
Telephone Number: 099 541 303  
Alternate Email: [EnvironmentalPlanning@nzta.govt.nz](mailto:EnvironmentalPlanning@nzta.govt.nz)

# MADELEINE WRIGHT

BARRISTER

19 September 2025

Auckland Council  
Private Bag 92300  
Victoria Street West  
Auckland 1142

By email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

Copy to: Andrew Fawcett, Director, Vineway Ltd; Andrew Allsopp-Smith, Project Manager, Vineway Ltd

## SUBMISSION ON PC 119 (PRIVATE): ARA HILLS (HALL FARM)

To: Auckland Council

Date: 19 September 2025

Submitter: Vineway Ltd.

Vineway Ltd has an interest in the site to the west of the PC 119 site. This site has been listed in the Fast-track Approvals Act 2025 for residential development. The development is called Delmore and the site is referred to as the Delmore site.

Submission on: PC 119 (Private): Ara Hills (Hall Farm) (“PC 119”) to the Auckland Unitary Plan (“AUP”)

Trade competition: The submitter is not a trade competitor<sup>1</sup>

Submission: This submission relates to the entire of PC 119. The submitter does not oppose residential development of the PC 119 site, but it opposes PC

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<sup>1</sup> *Queenstown Central Ltd v Queenstown Lakes District Council* [2013] NZHC 815 at [114]-[161]

# MADELEINE WRIGHT

119 in its current form. The reasons for this are set out under the heading “Detailed submission” below.

- Decision: The submitter seeks that PC 119 be rejected unless further information is provided, and amendments made, that address the matters raised in this submission.
- Heard: The submitter wishes to be heard on this submission. If others make a similar submission, the submitter will consider presenting a joint case with them at hearing.

## Detailed submission

1. The submitter opposes PC 119 because it:
  - a. Is based on inadequate information.
  - b. Does not promote sustainable management of natural and physical resources: s 5 RMA
  - c. Does not recognise and provide for all relevant matters of national importance: s 6 RMA
  - d. Does not have particular regard to all relevant matters in s 7 RMA
  - e. Does not properly take into account the principles of the Treaty of Waitangi: s 8 RMA
  - f. Does not give effect to all relevant national policy instruments: ss 67 and 73 RMA
  - g. Does not give effect to the Regional Policy Statement (“RPS”) component of the AUP: ss 67 and 73 RMA
  - h. Is not the most appropriate way to achieve the purpose of the RMA: s 32 RMA
2. The reasons why the submitter considers PC 119 fails to meet these statutory requirements are as follows.

# MADELEINE WRIGHT

## Transport

### 2.1 PC 119:

- a. **Fails to align the NoR 6 road within its site with the road alignment of the NoR 6 concept plan included in the designation.**

At the PC 119 site's western boundary, the NoR 6 road shown on the PC 119 proposed plans<sup>2</sup> does not match the alignment in the NoR 6 concept plan. At this location the concept plan represents the most efficient and effective road alignment because of the topographical constraints at and around that location. The PC 119 alignment would push the NoR 6 road to a location that would require greater earthworking, greater stabilising, and great vegetation clearance, including within an area with indigenous vegetation protected by consent notice. It would, also likely see the NoR 6 road fall outside the designation boundary at some points. The discrepancy between the PC 119 proposed plans and the concept plan is shown in **Attachment A**. The NoR 6 road in the PC 119 site and shown on the PC 119 proposed plans needs to match the NoR 6 concept plan at this point.

8.1

- b. **Refers to the road connecting Grand drive with the Delmore site at the PC 119 western boundary as a "Future" arterial road "with restricted vehicle access".**

There is no rationale reason for referring to this road as a "Future" road because it is a critical access road for the PC 119 site and forms part of the PC 119 site road network. There is also no rationale reasons for restricting vehicle access to this road. The public will need to use the road to access the PC 119 site and its amenities. The road is also an important access point for development on the Delmore site, and ultimately for linking the PC 119 site with Upper Orewa Road and development to the south. If this road is to be a local road in the short term it should be referred to as a local road with its future classification identified separately. The "restricted vehicle access" notation should be deleted.

8.2

- c. **The proposed plan provisions do not provide for, or inadequately provide for, road infrastructure currently required to be provided by the applicants existing resource consent.**

The conditions of the existing resource consent applying to the PC 119 site reflect the road infrastructure requirements that are essential to support the site's development. That infrastructure is even more critical if the PC 119 site is to be intensified beyond the existing resource consent, which is what PC 119 provides for. It is therefore essential that the plan provisions applying to the PC 119 site set up a

<sup>2</sup> PC 119 plan change report Appendix B

framework that will see this road infrastructure included as a requirement of any future resource consent. This includes (but is not necessarily limited to):

- A requirement for the part of the NoR 6 road traversing the PC 119 site up to the PC 119 site's western boundary (referred to in the resource consent and the relevant plan as Road 1) "to be formed".<sup>3</sup>
- A requirement for a pedestrian/cycle bridge across SH1 to Grand Drive and Arran Drive.<sup>4</sup>
- A requirement for a new left turn lane on the northbound offramp.<sup>5</sup>

Amendments need to be made to the PC 119 proposed plan provisions to that effect.

8.3

- d. **Includes a road layout reliant on external road connections with the Delmore site that are unrealistic because of topographical and engineering constraints, and which do not reflect the information available about the road network on the Delmore site or have not been discussed with the submitter.**

The western section of the PC 119 site relies solely on connections to either the existing unformed paper road to the west of the PC 119 site, or to the Delmore site along the southern boundary of the PC 119 site.<sup>6</sup> The proposed road layout differs from the road network approved under the existing resource consent, which is serviced only by the Grand Drive interchange. This road layout is problematic and unlikely to be achievable because:

- The PC 119 site and the Delmore site are bisected by an unformed paper road, which forms the legal boundary between the two sites. This paper road runs north through the Nukumea Reserve, which is identified in the AUP as a Significant Ecological Area ("SEA-T"). To the south, the paper road traverses the Delmore site but will ultimately be replaced by the NoR6 road. The PC 119 Precinct Plan 2 map shows 22 residential allotments fronting this paper road, which provides sole vehicle access. It is unrealistic that this section of the paper road will be constructed, given the steep topography (approximately 20% grade which is not compliant with Auckland Transport's

<sup>3</sup> Refer PC 119 Appendix D decision para 103 and first bullet; condition 13(f)

<sup>4</sup> Refer PC 119 Appendix D decision para 103 and second bullet; condition 13(m) - (o)

<sup>5</sup> Refer PC 119 Appendix D condition 13(l)

<sup>6</sup> The proposed roading layout differs from the roading network approved under the existing resource consent, which is serviced only by the Grand Drive interchange: Application numbers: BUN20441333, SUB60035991, LUC60010513, DIS60048302, DIS60048335, LUS60048380 & WAT60051016

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standards) and the extent of vegetation protected by the SEA-T overlay in the north. The Delmore site masterplan does not currently propose any road connections at this location for these reasons. Should the use of the paper road be pursued, a cul-de-sac will need to be provided at the southern end, and further assessment will need to be provided for earthworks and vehicle tracking to ensure there are no adverse effects to the environment on the Delmore site.

- The PC 119 Precinct Plan 2 map indicates two connections into the Delmore site along the PC 119 site's southern boundary, which would ultimately connect to the NoR6 road. This design does not account for large level differences and challenging topographical constraints at the common boundary. The design of the NoR 6 road has strict engineering standards which cannot be deviated from. The submitter is not averse to road connections between the PC 119 site and the Delmore site in principle. This is an important part of achieving a connected and so well-functioning urban environment on the western side of SH1. However, although the submitter has previously reached out to the applicant about the interface between the two sites, the applicant has not discussed the road connections shown in the PC119 documentation with the submitter. For the reasons above, the submitter has significant concerns about the connections in the PC 119 documentation. Without a reliable connection into the Delmore site or the paper road, 146 proposed residential allotments do not have vehicle access.

The road network within the PC 119 site needs to be redesigned to address these issues. The submitter is open to working with the applicant.

8.4

- e. Is supported by a traffic assessment that fails to consider anticipated surrounding growth, including on the Delmore site.**

## Urban Design

### 2.2 PC 119:

- a. Provides for zoning along the northern, western, and southern boundaries of the PC 119 site that does not reflect what the PC 199 plan change report states is the intended outcome for those areas.**

The PC 119 proposed plans show Mixed Housing Urban Zone along the northern and north-western boundaries, but homes are not (or should not) be within these areas. This is supported to ensure set back and buffer from the Nukumea Reserve and the Delmore site. The zoning needs to be changed to reflect this and should be Open Space Zone.

8.5

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Similarly, an Open Space Zone setback needs to be provided along the western boundary of the southern portion of the PC 119 site to ensure there is space for batters and retaining and to avoid poor interface between the Delmore site and the PC 119 site.

## Indigenous biodiversity

### 2.3 PC 119:

#### **a. Fails to recognise and provide for the protection of the entire Nukumea Reserve SEA-T.**

PC 119 includes a “Nukumea Reserve Protection Sub-precinct” which provides additional controls for activities that are located adjacent to the Nukumea Reserve SEA-T. However, this Sub-precinct only applies to the part of the Reserve located at the north-west boundary of the PC 119 site and does not provide any protection for the part of the Reserve located at the boundary further north. It needs to be extended along the entire boundary.

8.6

#### **b. Fails to include any assessment of PC 119 against the NPS-IB**

PC 119 must give effect to (implement) the NPS-IB. This includes meeting the directive clause applying to the Nukumea Reserve SEA-T which requires avoidance of specified effects. This clause applies within the PC 119 site as well because the SEA-T extends into it. PC 119 must also give effect to clauses regarding maintenance of indigenous biodiversity and highly mobile fauna species. The PC 119 plan change report does not include an assessment of the NPS-IB. Without this, it is not possible to determine if PC 119 meets the statutory requirement to give effect to the NPS-IB.

8.7

## Erosion

### 2.4 PC 119:

#### **a. Has development setbacks from water ways that are not based on a geomorphic risk assessment**

8.8

The purpose of a geomorphic risk assessment is to understand the risks posed by natural geomorphic hazards and in particular the tendency for water ways to move and resulting risk of erosion and instability. Some PC 119 development sites appear to be only 10m from water ways within the site, and others appear to be less than 20m. The submitter understands that 20m is the ‘default’ setback distance required by Auckland Council in the absence of a geomorphic risk assessment. Without this information it is not possible to confirm that the development will be

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safe or whether PC 119 gives effect to or is consistent with objectives and policies relating to natural hazards in applicable national policy statements and the AUP.

## Infrastructure

### 2.5 PC 113:

- a. Has a servicing plan that is based on out-dated correspondence with Watercare that does not reflect Watercare's current position on its infrastructure capacity** | 8.9

Appendix T includes correspondence with Watercare confirming capacity for PC 119 to connect to its water supply network and its wastewater network after the Army Bay stage 1 upgrade. This correspondence is from 2024 and does not align with Watercare's current public messaging that there is no capacity in its water supply network until at least 2038. The current situation suggests alternative water supply solutions are needed, at least until 2038. Further, Watercare's standard approach is to confirm capacity is available after resource consent is granted and building consent is applied for, on a first come first served basis. The submitter's expectation is that Watercare will service any consented residential development that comes to it in this way. Watercare is an essential service provider with a monopoly on water and wastewater servicing, and so is obligated to provide these services to dwellings that are ready to and need a connection.

- b. The stormwater management approach fails to provide for 1% AEP attenuation and risks increasing hazard risks** | 8.10

The southern catchment for the PC 119 site flows into the Delmore site. The Stormwater Management Plan submitted with PC 119 as part of Appendix K shows an increase in flood level from 17.55 to 17.74 (an increase of approximately 200mm). No attenuation for the 1% AEP has been provided. As the Delmore site is contained within this ponding area, this would have a direct impact on the Delmore site. This increase will also put additional pressure on the motorway culverts, which have been identified by Auckland Transport and New Zealand Transport Agency as high risk. Without this work it is not possible to determine whether PC 119 is consistent with other parts of the AUP and gives effect to national policy provisions relating to natural hazards.

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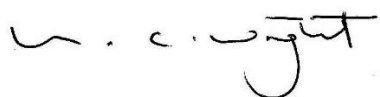
Iwi consultation

## 2.6 PC 119:

- a. Is based on consultation undertaken with iwi seven years ago which has meant that iwi who are likely to consider the PC 119 site to be within their rohe have not had input

8.11

The iwi consultation record is provided in Attachment R to the PC 119 plan change report. It records consultation as having been undertaken in 2018. The only follow up consultation since that date appears to have been with Ngāti Manuhiri. The submitter is aware that at least Ngaati Whaanaunga and Te Kawareau ā Maki may consider the PC 119 site to be within their rohe. Consequently, PC 119 may have the potential to adversely affect their cultural relationships with ancestral whenua, awa, waahi tapu, taonga. Both iwi have been actively involved in development projects encircling the PC 119 site and may have decided they needed to undertake a cultural impact assessment of PC 119, with associated recommendations, if they had been approached. The applicant's failure to reach out to these iwi since 2018 and before lodging PC 117 in 2025, has deprived them of this opportunity. The effect is that there is insufficient information to determine if PC 119 recognises and provides for s 6(e) values, recognises and provides for kaitiakitanga as required by s 7(a), or properly takes into account the principles of Te Tiriti o Waitangi.




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Contact person: Madeleine Wright

TIE IN WITH ARA HILLS DEVELOPMENT

LEGEND GENERAL

- CONTROL LINE
- EXISTING PROJECT
- EXISTING DESIGN
- PROPOSED DESIGN
- PROPOSED RIGHT-OF-WAY
- PROPOSED FILL BATTER
- PROPOSED CUT BATTER
- PROPOSED FILL BATTER
- PROPOSED RAISED MEDIA
- PROPOSED CUT BATTER

9

**SUBMISSION ON A NOTIFIED PLAN CHANGE<sup>1</sup> – PC 119 (Private): Ara Hills (Hall Farm)**

**To:** **Auckland Council**  
Unitary Plan Private Bag 92300  
Auckland 1142  
Attention: Planning Technician  
By email: unitaryplan@aucklandcouncil.govt.nz

**Submitter:** AV Jennings Hobsonville Pty Ltd

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**1. INTRODUCTION**

- 1.1 This is a submission on Proposed Plan Change 119 (Private): Ara Hills (Hall Farm) to the partly operative Auckland Unitary Plan ("AUP").
- 1.2 The Submitter could not gain an advantage in trade competition through this submission.

**2. CONTEXT**

- 2.1 The Submitter is the applicant of PC 119.

**3. SUBMISSION**

- 3.1 The submitter generally supports the submission, the provisions to which this submission relates are:
- (a) MDRS provisions;
  - (b) Precinct provisions proposed by Watercare, relating to bulk supply of water and wastewater;
  - (c) Arterial Road and the Precinct boundary; and
  - (d) Recognising the proposed vegetated areas within the Precinct Plan as deep soil areas.

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<sup>1</sup> Clause 6 of Schedule 1 to the Resource Management Act 1991.

#### 4. REMOVAL OF MDRS PROVISIONS

- 4.1 The Resource Management (Consenting and Other System Changes) Amendment Act 2025 enables Auckland Council to opt out of the Medium Density Residential Standards (“MDRS”) by withdrawing PC 78 and notifying a new plan change that will at least provide as much housing capacity as PC 78, among other criteria.
- 4.2 The Council’s Policy and Planning Committee endorsed the draft replacement change on 18 August 2025. If the Committee confirms withdrawal of PC78 at its 24 September 2025 meeting, the Council must notify the Minister by 10 October 2025, with public consultation of the replacement plan change expected from 3 November to 19 December 2025.
- 4.3 Given the above events, confirmation that MDRS will no longer apply is expected shortly. The Submitter therefore seeks that the MDRS provisions in its notified precinct provisions (incorporated based on Auckland Council’s MDRS guidance) including associated Qualifying Matter identification boxes be removed, except for the notification provisions. This includes but it is not limited to provisions relating to:
- (a) References to MDRS in the zone description;
  - (b) Policy 19;
  - (c) Table IXXX.4.4 Activity table – Residential Density Standards - MDRS (Mixed Housing Urban Zone and Residential – Terrace Housing and Apartment Buildings Zone);
  - (d) IXXX.6.1.3 Building height;
  - (e) IXXX.6.1.4 Height in relation to boundary;
  - (f) IXXX.6.1.5 Yards (except standard for riparian yards should apply in the I553 Orewa 4 Precinct);
  - (g) IXXX.6.1.6 Building coverage;
  - (h) IXXX.6.1.7 Landscaped area;
  - (i) IXXX.6.1.8 Outlook space;
  - (j) IXXX.6.1.10 Outdoor living space;
  - (k) IXXX.6.1.10 Windows facing the street;
  - (l) IXXX.6.3.2 Standards for controlled subdivision activities;
  - (m) I553 6.1.8 Mixed Housing Urban Zone (1-3 Dwellings Only and not within the Nukumea Precinct overlay);

- (n) I553. 7 Assessment – controlled activities;
- (o) I553.8 Assessment – restricted discretionary activities and
- (p) I553.8.2 Assessment Criteria.

## **5. SUPPORT FOR WATERCARE’S PROPOSED PROVISIONS SUBJECT TO CLARIFICATION**

5.1 The Submitter generally accepts Watercare’s proposed Precinct provisions, but only to the extent that:

- (a) The Plan Change recognises that the site is connected to Watercare’s reticulated network;
- (b) The Submitter holds resource consent for 575 residential and mixed use lots;
- (c) Watercare has included those lots within its allocation / confirmed availability of 4,000 dwellings in the Hibiscus Coast area;
- (d) Additional dwellings beyond the 575 can be connected after the Army Bay WWTP Stage 1 upgrade is completed and commissioned (which is currently anticipated in 2031).

5.2 Subject to confirmation by Watercare that the following standards and associated provisions of the Precinct Plan will be interpreted and applied in that manner, further changes to the Precinct Provisions will not be necessary:

- (a) Precinct Description;
- (b) Objective (2);
- (c) Policy (17);
- (d) Table IXXX.4.1 All zones (A2), (A5), (A7); and
- (e) Standard IXXX.6.2.6 Bulk Water Supply and Wastewater Infrastructure.

5.3 IXXX.6.3.1 Subdivision standards for the precinct, bullet point 3.

5.4 If Watercare is unable to provide such confirmation, then the Submitter accordingly seeks amendments to the proposed Precinct provisions such that the provisions reflects paragraph [5.1] above.

## **6. AMENDMENT TO INDICATIVE ROAD SHOWN IN PRECINCT PLANS 1 AND 2**

6.1 Precinct Plans 1 and 2 currently show an “Indicative Future Arterial Rd with restricted vehicle access”. This road is largely completed, except for a small section on the western end that connects to the Precinct boundary and is required to vest as a paper road.

6.2 The Submitter seeks that Precinct Plans 1 and 2 are amended as follows:

- 

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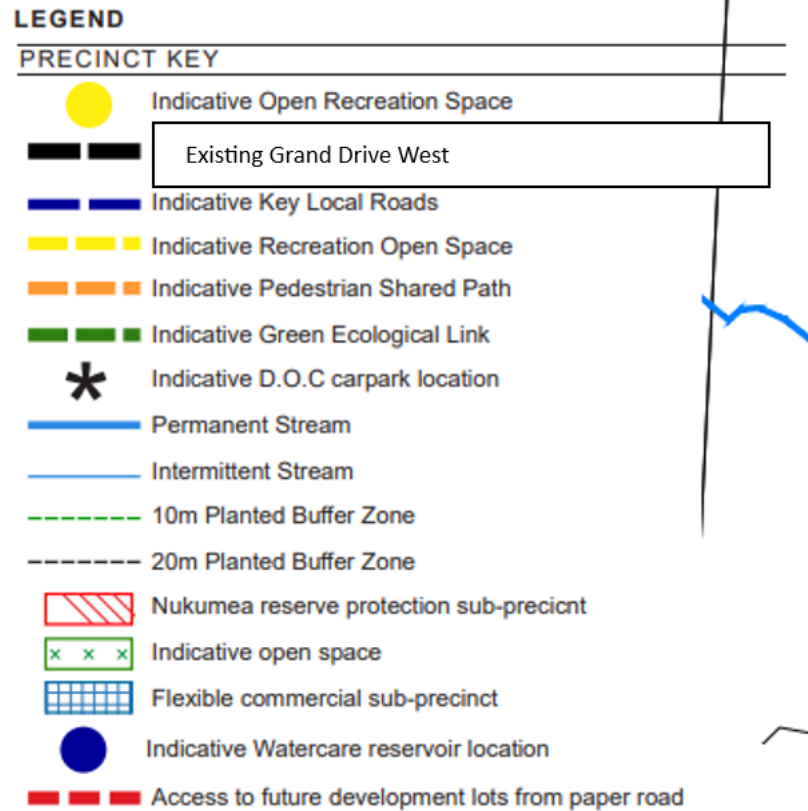


Figure 2: Amended Legend to Precinct Plan 1

6.3 The road connection shown in the Precinct Plans has largely been constructed, with the balance provided for through NoR 6. See NoR 6 General Arrangement Plan, attached, and snip below.

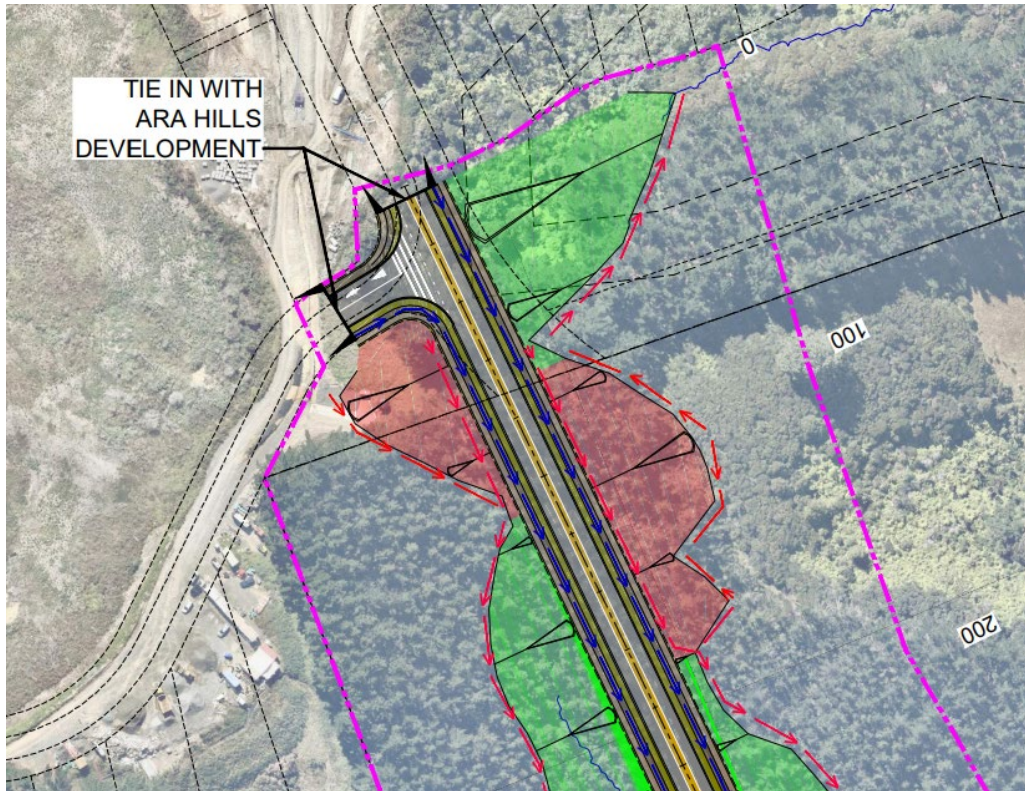


Figure 3: NoR 6 General Arrangement Plan

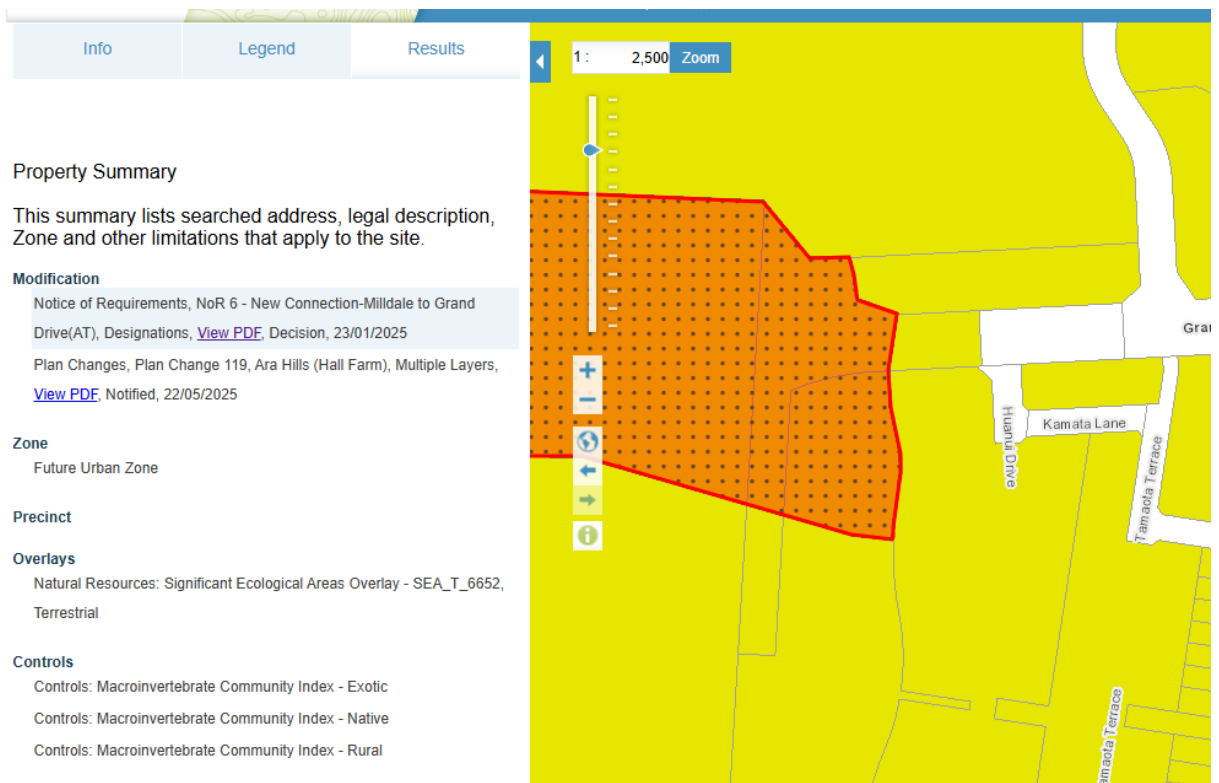


Figure 4: Auckland Council Unitary Plan showing NoR 6 Overlaid on the Submitters Land

6.4 Given the NoR and the proposed works extending Grand Drive, there is no utility in having the road extension area part of the Precinct. It cannot be used for residential development and is not required to service any development within the Precinct and zoning is not applied to roads.

6.5 The Submitter seeks that references made to the future arterial road are removed or amended as the arterial road corridor has already been vested. The relevant provisions include:

(a) Objective IXXX.2(10) *The design of the neighbourhood centre takes account of the ~~future~~ arterial road ~~connection~~ corridor through the Precinct to safeguard this future connection in the wider Orewa West area.* 9.3

(b) Policy IXXX.3(4) *The design and built form of the neighbourhood centre must take account of the ~~future~~ arterial road corridor and incorporate restricted vehicle access as shown on Precinct Plan 1.* 9.4

(c) Policy IXXX.3(8) *Locate, construct and vest the indicative road layout and transport upgrades, including pedestrian linkages and cycleways and safeguard the ~~future~~ arterial road corridor, in general accordance with Precinct Plan 1 and the relevant staging provisions. Any required amendments to the existing road network, including pedestrian and cycleways must be designed and undertaken in consultation and with the agreement of Waka Kotahi - NZTA and Auckland Transport.* 9.5

(d) IXXX.6.2.7 Vehicle Access Restriction

*Purpose: To safeguard the ~~future~~ arterial status of Grand Drive West corridor and ensure vehicle and pedestrian safety.* 9.6

*(1) Standard E27.6.4.1(3) applies to all the site boundaries along the frontage of Grand Drive West. No vehicle crossings are allowed off Grand Drive West.*

(e) IXXX.6.3.8 Subdivision standards for Roading and Access

*(3) All roads must be constructed in accordance with the relevant road controlling authority standards and must be vested in Council. The location of the road types must be in general accordance with Precinct Plan 1.*

*Note: The precinct plan does not require the physical formation of the indicative future arterial or Grand Drive to the western boundary. However, an arterial width road corridor paper road has been vested as part of the underlying Infrastructure Funding Agreement with Auckland Transport.*

**[Note: the above advice note is unnecessary if the Precinct Boundary is altered].**

## Vehicle Crossings Restrictions

(4) Standard E27.6.4.1(3) applies to the site boundaries along **Grand Drive West** ~~the Indicative Future Arterial~~ shown on Precinct Plan 1. No vehicle crossings are allowed off **Grand Drive West** ~~the Indicative Future Arterial~~

9.7

## 7. DEEP SOIL AREAS

7.1 Precinct Plan 2 shows extensive areas of mature vegetation, including:

- (a) Broadleaf forest and shrubland;
- (b) Kanuka riparian forest;
- (c) Formal parkland;
- (d) Mixed Shrubland; and
- (e) Kahikatea swamp forest.

7.2 These large, vegetated areas will help combat climate change and help to reduce heat island effects, as well as providing areas for rainwater to replenish groundwater.

7.3 If and to the extent that the underlying zoning standards are changed to require the provision of deep soil areas, or other areas containing mature planted trees, the Precinct provisions should be amended to expressly enable the planted areas listed above and shown in Precinct Plan 2 as contributing towards any deep soil area obligation.

## 8. RELIEF SOUGHT

8.1 For the foregoing reasons, the Submitter seeks the following outcomes in relation to PC 119:

(a) Approve but amend the Proposal and the provisions of the Precinct Plan by:

(i) Removing the MDRS provisions as they are no longer relevant;

9.1

(ii) Support the Precinct provisions proposed by Watercare provided that there is confirmation that the provisions will be applied in the manner outlined in this submission and otherwise amend the provisions to reflect this submission.

9.2

(iii) Amend the provisions of the Precinct, and the Precinct Plans , such that:

(A) It is clear that the arterial road corridor width has already been delivered for Grand Drive West;

see above  
9.3, 9.4,  
9.5, 9.6 and  
9.7

(B) To remove the unformed or 'paper road' part of Grand Drive West from the Precinct as shown on Figure 1; and

9.8

- |                                                                                                                       |      |
|-----------------------------------------------------------------------------------------------------------------------|------|
| (C) Refer to NoR 6, to the extent necessary, to reference any future extension and construction of the Arterial Road. | 9.9  |
| (iv) Recognising the proposed vegetated areas within the Precinct Plan as deep soil areas.                            | 9.10 |
- (b) Such further or other consequential relief as may be necessary to give full effect to the issues raised, submission points set out and relief sought in this submission.
- 8.2 The Submitter wishes to be heard in support of this submission.
- 8.3 If others make a similar submission, the Submitter will consider presenting a joint case with them at hearing.

**DATED** at **AUCKLAND** this 19<sup>th</sup> day of September 2025



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**A W Braggins**  
**Counsel for AV Jennings Hobsonville Pty Ltd**

**Address for service of the submitter:**

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**FORM 5**

**Submission on a publicly notified proposal for policy statement or plan, change or variation  
under Clause 6 of Schedule 1, Resource Management Act 1991**

To: Auckland Council

**Name of submitter:** Te Tāhuhu o te Mātauranga | Ministry of Education

Address for service: C/- Beca Ltd  
PO Box 6345  
Wellesley  
Auckland 1141

Attention: Eden Rima

Phone: +64 9 300 9000

Email: Eden.Rima@beca.com

**This is a submission on the Plan Change 119 (Private) – Ara Hills (Hall Farm)**

**The specific parts of the proposal that the Ministry of Education's submission relates to are:**

The Ministry are interested in the proposed rezoning due to capacity and connectivity in the surrounding area.

**Background**

Te Tāhuhu o te Mātauranga | Ministry of Education ('the Ministry') is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact existing and future educational facilities and assets within the Auckland region.

The Ministry has engaged with developers across the country, including the Auckland region, on plan changes. During consultation, specific objectives and policies that better enable the provision of future educational facilities (should there be a need) have often been agreed upon and there is an opportunity

on PC119 for the Applicant and the Ministry to work together to achieve favourable outcomes for the Ōrewa community and surrounding school catchments.

### The Ministry of Education's submission is:

Plan Change 119 (PC119) is seeking to rezone approximately 84 hectares of land in Ōrewa from Future Urban to Residential – Terraced Housing and Apartment Zone (THAB), Residential – Mixed Housing Urban Zone (MHU), Open Space – Informal Recreation Zone, Open Space – Conservation Zone and Business – Neighbourhood Centre Zone.

PC119 also seeks to apply a new precinct – Ōrewa 4 Precinct across the plan change area (PCA). The private plan change (PPC) aims to reflect the existing residential community and provide for the future growth of the community that recognises the unique landscape setting and protect and enhance the ecological, landscape and amenity values of the area.

PC119 is anticipated to enable 900 residential dwellings in a range of typologies including standalone units and terrace housing through the MHU and THAB provisions. Furthermore, of the 900 residential dwellings, 575 are already currently consented lots therefore a further 325 residential dwellings are now proposed to be built within the plan change area (PCA). This growth will increase the demand on the local school network in Ōrewa and the wider surrounding area.

The nearest school to the PCA is Nukumea Primary School – Te Kura Tuatahi O Nukumea (Nukumea Primary School) located 230m north east of the PCA. Ōrewa Primary School is located 1.1km east of the PCA and Ōrewa Beach School and Ōrewa College are both over 2km from the PCA, as shown in Figure 1 above.



*Figure 1: Schools in the vicinity of PCA*

The Ministry has an ongoing interest in:

- How development is planned and sequenced, particularly in terms of infrastructure provision such as roading as this will impact nearby schools.
- How safe walking and cycling infrastructure will be planned and delivered.
- The urban form and amenity provided through connectivity and usable area of public open space.

### *Connectivity*

The Ministry supports the proposed walking and cycling provisions through the PCA, as these provide safe, efficient links in and throughout the area. Quality pedestrian and cycle connections to schools and through neighbourhoods have health and safety benefits for children and reduce traffic generation at pick up and drop off times.

Existing nearby schools in the surrounding area should be well serviced by safe and accessible pedestrian and cycling links and having reviewed the plan change package, the Ministry consider the proposed provisions would require adequate consideration of walking and cycling provisions.

This includes connections back to the existing Ōrewa area affording the PCA to be well integrated into the existing urban environment, specifically:

- Nukumea Primary School is located the closest to the PCA but is currently not connected to the PCA, making it difficult to zone students from the PCA area to Nukumea Primary School. Currently, access to the school is via Grand Drive which goes past Ōrewa Primary School, resulting in extended travel distances for Nukumea Primary School and increasing traffic for Ōrewa Primary School. It is the Ministry's preference that a new local road connection is recommended from the PCA to Nukumea Primary School to increase connectivity and access and decrease traffic past Ōrewa Primary School.
- The PCA is also in zone for Ōrewa College which is steadily growing and will continue to do so with the PCA and surrounding areas being developed. Currently, there are connectivity issues between the PCA and Ōrewa College and as such new active modes connections are recommended to increase connectivity and access for existing and future students and staff of Ōrewa College.

The Ministry requests that AV Jennings Hobsonville Pty Limited (the Applicant) provide assurance that these linkages can be secured (including land acquisition and / or easements) and delivered as key transport infrastructure along with the other transport upgrades identified in the plan change.

### *Capacity*

The surrounding area is subject to further intensification and zoned for Future Urban Zone and MHU Zone, therefore PC119 will contribute to cumulative effects associated with intensification. Cumulative effects include an increase in the local population leading to higher enrolments at nearby schools,

potentially exceeding current capacity, particularly for Ōrewa Primary School where capacity is already constrained

The Ministry acknowledge that Nukumea Primary School has capacity, as such there is lesser concern regarding intensification effects on this school.

### **The Ministry's position on the Proposed Plan Change**

The Ministry is **neutral** on the private plan change.

The Ministry acknowledges that the PPC will contribute to providing additional housing within the wider Auckland Region however this requires additional capacity within the existing local transport network to cater for this growth as the area develops.

The Ministry understands that the Council must meet the requirement under the National Policy Statement on Urban Development 2020 (NPS-UD) to provide development capacity for housing and business. The Ministry wishes to highlight that Policy 10 of the NPS-UD states that local authorities should engage with providers of development infrastructure to achieve integrated land use and infrastructure planning.

Growth as a result of the PPC and wider urban growth will require careful planning and communication between the Applicant, Auckland Council and the Ministry to meet the community demand for current educational facilities. The Ministry's requested relief will ensure the current schools are well serviced with key transport and active modes links.

The Ministry seeks provisions in the plan change that will assist in the delivery of integrated communities with a street and block pattern that enables the concepts of liveable, walkable and connected neighbourhoods. This includes a transport network that is easy and safe to use for pedestrians and cyclists and is well connected to public transport, shops, schools, employment, open spaces and other amenities.

The Ministry's requested relief will ensure that current schools are serviced with suitable transport infrastructure in place, so that the increase in local population can utilise the existing school services sufficiently and easily, serving the surrounding community in a safe and effective manner for all school users.

### **Decision sought**

In the event that the Council confirms the proposed plan change, the Ministry requests that the following policy wording in the plan change be retained, as this enables integrated transport infrastructure and ensure that ākonga (students) have the ability to safely and conveniently walk and cycle to their local school.

Retention of the following provisions:

- *Objective 1: Subdivision and development are in accordance with Precinct Plan 1, and are staged, designed, and delivered to align with the provision and upgrading of open space and transport infrastructure (strategic road corridor, road connections and pedestrian and cycling linkages).* 10.1
- *Objective 5: A well connected, safe and efficient road network within the Precinct is provided, including connections to the wider roading and pedestrian network and to adjacent land, taking into account topography, watercourses and native vegetation.* 10.2
- *Objective 6: Pedestrian and cycle linkages within the Precinct are provided, including connections to the wider roading and pedestrian network and to adjacent land, taking into account topography, watercourses, riparian yards and native vegetation, to enhance recreation, connectivity and create a green network that links open spaces within the Precinct.* 10.3
- *Objective 10: The design of the neighbourhood centre takes account of the future arterial road connection through the Precinct to safeguard this future connection in the wider Ōrewa West area.* 10.4
- *Policy 8: Locate, construct and vest the indicative road layout and transport upgrades, including pedestrian linkages and cycleways and safeguard the future arterial road corridor, in general accordance with Precinct Plan 1 and the relevant staging provisions. Any required amendments to the existing road network, including pedestrian and cycleways must be designed and undertaken in consultation and with the agreement of Waka Kotahi - NZTA and Auckland Transport.* 10.5

In addition to this, the Ministry requests consideration for a new local road from the PCA to Nukumea Primary School and greater active modes connection to Ōrewa College to improve safe, accessible, and efficient pedestrian and cycle linkages between the precinct and Ōrewa College, supporting the needs of current and future students and staff.

**The Ministry wishes to be heard in support of its submission.**

*Eden Rima*

**Eden Rima  
Planner – Beca Ltd  
(Consultant to the Ministry of Education)**

**Date:** 23 September 2025